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**Marquardt GmbH**

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**Rely to Comment of the UWB Alliance regarding NPRM**

The Marquardt GmbH manufacturs UWB products operating under the UWB rules from Part 15, Subpart F

These products are used for secure automotive access applications which prevent the commonly known relay attacks to passive entry and start systems. The development to achive this accurate and secure type of measurement according to the 15.4 (LRP) standard started already in 2009. As the only secure solution to the proximity problem is the secure time of fligth measurement.

The now readily developed devices are to be sold world wide for different brands of cars, to solve the issue of easily stolen cars but still keeping the convinience to open and start them in a passive way.

The frequency band just above the 6GHz is very valuable to those systems as it is available nearly worldwide and provides the least freespace losses within the usfull bands.

It is very important for us and our customers that UWB with it’s demanding power limitations can continue to operate unhindered in that frequency band. We are very concerned by the proposal in the NPRM and the potential for interference as shown in the coexistence studies submitted by the UWB Alliance.

We agree with those organisations and other commenters that, should this go ahead, unlicensed broadband access systems should be limited in duty cycle and transmit power. We would like to suggest to the FCC to award only the least amount of spectrum required, and at as low a frequency as possible.