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August 7, 2019

Via ECFS

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
Washington, DC 20554

Re: Geophysical Survey Systems, Inc.,
Request for Waiver of Part 15 of the Commission's Rules to Market and Ultra-Wideband
Evaluation Kit
ET Docket No. 19-155
Ex Parte Statement

Dear Ms. Dortch:

Aviation Spectrum Resources, Inc. ("ASRI") hereby submits this statement with respect to the Reply comments submitted in this matter by Geophysical Survey Systems, Inc. ("GSSI"). In its Request, GSSI sought a waiver from specified Ultra-Wide Band ("UWB") technical and eligibility rules of Part 15 to market a Ground Penetrating Radar ("GPR") evaluation kit in support of autonomous road vehicle navigation. In its response on this matter, ASRI raised concerns with the Commission over possible effects to the aviation VHF services within the 117.975-137 MHz range. These VHF services are the Federal Aviation Administrations ("FAA") and aviation industry's primary links for national Air Traffic Control ("ATC") and Aeronautical Operational Control services. The aviation industry has previously experienced interference issues with Part 15 devices, especially unintentional radiators such as LED lights under Sub-section B, affecting aeronautical VHF datalinks at airports.

GSSI has now proposed a limiting provision for inclusion in the waiver authorization that would provide some assurance for the aviation safety links. After discussions with both counsel for GSSI and the Communication Service Providers ("CSPs") who provide these systems to the FAA and industry, it has been agreed that such a provision would suffice. Therefore, ASRI requests the Commission add the following limitation to GSSI waiver as below:

"Intentional emissions in the 117.975-137 MHz band shall be avoided."

This measure will provide more assurance to the protection of aviation safety systems operating in the 117.975-137 MHz band in response to the concerns raised by ASRI.

Respectfully Submitted,

/s/ Andrew Roy

Andrew C. Roy, Director of Engineering
Aviation Spectrum Resources, Inc.