

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

In the Matter of	)	
	)	
Amendment of Rules Governing	)	RM-11844
Ultra-Wideband Devices and Systems	)	
	)	
	)	

**COMMENTS OF VORTEZON, INC., SUPPORTING THE  
PETITION FOR RULE MAKING FILED BY ROBERT BOSCH LLC**

Vortezon, Inc. (“Vortezon”), respectfully submits these comments in reply to the Public Notice, *Consumer & Governmental Affairs Bureau Reference Information Center Petition for Rulemakings Filed*, Public Notice, Report No. 3130, July 18, 2019, RM No. 1184, by the Federal Communications Commission (“FCC”) in the above-referenced proceeding, which seeks comment on a Petition filed by Robert Bosch LLC (“Bosch Petition”) requesting that the Commission initiate a review of the Part 15, Subpart F regulations governing Ultra-Wideband (UWB) devices and systems.<sup>1</sup>

Vortezon supports any effort of the FCC to revisit and update adopt the regulations governing Ultra-Wideband (UWB) devices and systems, which regulations, as the Bosch Petition points out, have not been revised since their initial promulgation in 2002.<sup>2</sup> Vortezon concurs with the Bosch Petition that the current UWB technology has far out-paced the conservative 2002 UWB Rules. As the Bosch Petition articulates in its introduction:

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<sup>1</sup> Petition for Rule Making In the Matter of Amendment of Rules Governing Ultra-Wideband Devices and Systems (filed June 18, 2019) (Bosch Petition), which was assigned RM-11844, <https://ecfsapi.fcc.gov/file/10618992215487/2019%20FINAL%20PETITION%20FOR%20RULE%20MAKING%20for%20FCC%20Filing.pdf>.

<sup>2</sup> See *First Report and Order*, FCC 02-48, 17 FCC Rcd. 7435 (2002) in Docket 98-153.

The current UWB rules (principally but not exclusively the technical and definitional rules) are so stringent that of necessity, virtually all new UWB products and systems must apply to the Commission for, and be subject to a waiver as an incident of being granted certification for marketing and sale of the device in the United States. There is a well-established and acknowledged need to revisit the UWB rules – something that the Commission always intended to do – to allow new, useful, innovative and spectrum-efficient UWB products to be brought to the United States marketplace, as they are now in most other countries of the world.

Specifically, Vortezon, Inc. agrees with the Petitioner that, as stated at Page 35 of the Bosch Petition, "UWB outdoor (mobile and fixed) applications for surveillance should be available generically, but with necessary interference mitigation restrictions." In addition to the proposed changes to the UWB rules contained in the Appendix to the Bosch Petition, Vortezon, strongly urges the Commission to substantially increase maximum allowable ERP to a level that will not just merely permit UWB applications to communicate a mere few meters, but to communicate for at least 500 meters in order to spur innovation and create safety and security without creating harmful interference by adopting appropriate technical standards.

### **Conclusion**

Vortezon supports the Bosch Petition and requests that the FCC implement the regulatory process in order to revisit and update adopt the regulations governing Ultra-Wideband (UWB) devices and systems.

Dated: August 19, 2019

Respectfully submitted,

/s/ Peter T. Lewis

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