

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
)	
Petition for Rulemaking: Amendment of)	CG RM-11844
Rules Governing Ultra-Wideband Devices)	
and Systems)	

Comments of MARPOSS S.p.A.

Alessandro Strada
Chief Executive Officer

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Introductions

MARPOSS is a major international group with its headquarters in Italy and affiliated US companies in Auburn Hills (MI), Ann Arbor (MI), Livonia (MI) and Fremont (CA).

As a member of the UWB Alliance, MARPOSS supports Robert Bosch LCC's request¹ to review the ultra-wideband ("UWB") rules.

Arguments

MARPOSS is a worldwide leader in precision equipment for measurement and control in the manufacturing environment. Our inspection, measurement and process control solutions are extensively employed in the automotive and aerospace industry, serving the need for optimization typical of highly automatic manufacturing systems.

For three decades, MARPOSS has been developing wireless solutions for its products in order to transmit measurement and monitoring information reliably and effectively through the harsh and chaotic environment of a workshop floor.

In recent years, the impact of both industrial and personal Wi-Fi networks has often resulted in the sub-optimal operation of other competing technologies. Our continuous research in the development of new solutions has led us to explore UWB technology, with interesting and promising results.

MARPOSS strongly believes that it is of paramount interest to the industrial community of the U.S.A. that UWB technology be given a new harmonized and favorable set of rules. This will encourage and foster the most effective realization of its widely-acknowledged technical advantages in the industrial environment.

It is in consideration of such extraordinary opportunities that we respectfully request that the Commission make provisions in the rules governing UWB so as to leave ample room for its coexistence with competing transmission systems.

¹ Robert Bosch LLC, Petition for Rulemaking, 18 Jun 2019, CG RM-11844

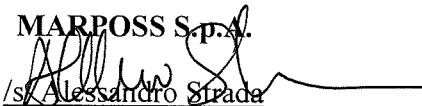
Furthermore, MARPOSS also supports the view set-out in Robert Bosch LCC's petition regarding an "incremental opportunity", as described in the UWB Alliance's own comments.

Conclusion

Considering the points mentioned above, MARPOSS respectfully requests that the Commission begin the process of revising and updating the rules governing UWB operations.

Respectfully Submitted,

MARPOSS S.p.A.


/s/ Alessandro Strada

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