

**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 Sewio Networks s.r.o.**

August 29, 2019

Sewio Networks s.r.o. (Sewio) would like to express its full support for Robert Bosch LCC's request<sup>1</sup> to review the ultra-wideband (UWB) rules.

Sewio products operate under FCC Part 15, Subpart F (the ultra-wideband rules) and Subpart C, §15.250 (the so-called wideband rules). Sewio develops a real-time location system (RTLS) for indoor tracking based on ultra-wideband (UWB) technology that drives business results for companies in the intralogistics, retail, warehouse and factories. It provides customers and partners a precise, reliable, fully scalable and customer-centric IoT solution for indoor tracking that allows process visibility, boosts production efficiency, simplifies the inventory process and increases safety. Sewio customers include Volkswagen, Budvar, Pirelli, Matador, TPCA, Škoda.

Sewio's priority is a review of the prohibition on fixed outdoor transmitters given that there is growing customer request for localization indoor in combination with localization outdoors. For example, in warehouses and factories goods are very often stored also in close vicinities of the adjacent buildings. Therefore, allowing fixed outdoor transmitters would allow seamless transitions of localization between indoor and outdoor localization with just one technology.

Sewio sees the main use of ultra-wideband in RTLS, because it is the only RF technology which delivers such high precision functionality even in environments with many metallic structures such as in press shops or heavy metal factories. Therefore, Sewio supports the Second Report and Order<sup>2</sup> in order to prevent wide-area communication systems from using ultra-wideband.

Sewio also supports the goal of having more globally harmonised rules which would benefit to spread the technology to more partners and consequently to many more consumers.

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<sup>1</sup> Robert Bosch LLC, Petition for Rulemaking, 18 Jun 2019, CG RM-11844

<sup>2</sup> UWB Second R&O, 19 FCC Rcd at 24571, paragraph 27