

**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)	

To: The Chief
Office of Engineering and Technology
Via: ECFS

InnoTec21 GmbH Reply to UWB Alliance Comments

On July 18, 2019 the Federal Communications Commission (FCC) in its Public Notice published the filing of the Petition for Rulemakings RM 11844, submitted by the petitioner Robert Bosch LLC (Bosch), in which Bosch requests the FCC initiating a review of the Part 15, Subpart F regulations governing Ultra-Wideband (UWB) devices and systems. InnoTec21 GmbH (IT21), a global engineering and service company, by counsel and pursuant to Section 1.405 of the Commission's Rules (47 C.F.R. § 1.405), would hereby like to respectfully reply to a statement filed in support of the Petition by the industry alliance UWB Alliance. IT21 therefore hereby respectfully submits in its reply to such statement some focused comments on the supporting UWB Alliance statement and in addition continues its statement of strong support for the Petition.

Advanced interference mitigation techniques enabled by today's modern radio technology implementations bear the potential to enable co-existence of various unlicensed innovative radio services including UWB and others with authorized and protected legacy radio services. The maximum use of the radio spectrum can be achieved by applying a high degree of flexibility offered by modern sophisticated radio spectrum access rules and the implementation of advanced radio co-existence rules for protection at the same time. Modern radio technologies enabling such techniques

and algorithms make it possible nowadays to shift the paradigm in spectrum usage from “ultra-conservative” and “overprotection” towards “maximum efficiency” and “co-existence”.

Applying fair spectrum access rules based on co-existence and interference mitigation to any envisaged user bears the potential to protect existing authorized radio services while at the same time enabling innovative applications based on unlicensed spectrum access.

InnoTec21 GmbH would like to underline in particular the incremental opportunity contained in the supportive and constructive statement from the UWB Alliance. Such an incremental approach may open the licensed exempt spectrum for more advanced users and innovative uses (including the controversial 6 GHz Band) without compromising co-existence to any other radio service, may it be traditional authorized service enabling critical infrastructure support or may it be innovative non-licensed service (like UWB) enabling unique and advanced applications.

InnoTec21 GmbH very much appreciates the constructive statement of the UWB Alliance supporting the Petition as it may open the spectrum for any interested stakeholder on a longer term. Based on this filing IT21 respectfully continues to request the FCC to initiate rulemaking to revise and update the existing “ultra-conservative” rules governing UWB operation with the target of maximum spectrum exploitation while protecting existing authorized services by the means of fair spectrum access and co-existence to enable further strong growth and innovation.

Respectfully submitted,
InnoTec21 GmbH

By:_____

Dr. Sven Zeisberg