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8 May 2000

EX PARTE OR LATE FILED

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

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MAY 08 2000
FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Re: *Ex Parte – ET Docket No. 98-153*
Ultra-Wideband

Dear Ms. Salas:

On Friday, 5 May 2000, undersigned counsel for Time Domain Systems, Inc. contacted Commissioner Susan Ness and her legal advisor, Mark Schneider, regarding the above-captioned matter. I argued that the pending NPRM in this matter should not be delayed because of concerns about GPS issues at the World Radio Conference (WRC).

More specifically, I pointed out that the U.S. position at WRC is to oppose any new allocation for MSS in 1559-1567 MHz band where GPS operates. I also pointed out that such an allocation is also opposed by CITEL, CEPT, APT, a group of African administrations, ICAO, IMO, and for good measure, Cuba. I argued, therefore, that there would be no serious attempt at WRC to put MSS in the GPS bands.

I argued that the only GPS controversy at WRC seems to be whether to eliminate Resolution 220 (calling for studies of MSS/GPS sharing) or to retain it for further studies. I pointed out that most of the significant parties (except CEPT) support eliminating the Resolution, and that even CEPT will support its elimination if a MSS downlink is added in the 1518-1525 MHz band.

In short, I argued that there is nothing of consequence at issue at WRC affecting GPS, and that delaying an NPRM on ultra-wideband technology due to the WRC is unnecessary.

Sincerely yours,

Scott Blake Harris

cc: Susan Ness
Mark D. Schneider

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