

Your application is for an UWB surveillance system. These systems must operate in the band 1990-10,600 MHz under rule part 15.511. Why are you asking to operate as a through wall system 15.510? Unless you can provide a valid justification, your application will need to be dismissed.

Confirmation Number: EL591367

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This experimental device adapts ultra-wideband ground penetrating radar (GPR) technology to the task of area surveillance. We think there are good arguments, summarized below, that the device complies with either Section 15.510 or 15.511.

We met with OET about this device on February 28, 2006, and may file a written request for interpretation or waiver of the technical and/or marketing rules. The experimental license is needed to support research in the meantime.

The device complies with the technical rules in Section 15.510 for a through-the-wall imaging system whose ultra-wideband bandwidth is below 960 MHz. The device in fact operates as a through-the-wall system, except that in some instances it looks upward through pavement instead of sideways through a vertical wall. We believe that it comes within the scope of Section 15.510.

Alternatively, this also qualifies as a surveillance device under Section 15.511. That section requires the operating bandwidth to lie between 3.1 and 10.6 GHz, and sets emissions limits for frequencies below 960 MHz. This device has its operating frequencies below 960 MHz, and complies with the emissions limits at those frequencies. It is thus quieter and less interfering than a typical Section 15.511 device. To put this another way, the device would be unquestionably compliant with Section 15.511 if it had additional signal between 3.1 and 10.6 GHz. We think the Experimental Licensing Branch should not penalize the device merely because it emits less energy.

In any event, even if compliance with Section 15.510 or 15.511 were in question, we respectfully suggest that the device should be considered eligible for an experimental license.