

Comments of the
Ultra Wide Band (UWB) Alliance
to the
Federal Communications Commission
on
OFFICE OF ENGINEERING AND TECHNOLOGY SEEKS COMMENT ON
KONTUR, AS PETITION FOR WAIVER OF SECTIONS 15.503(D), 15.31(C),
AND 15.521(D)
OF THE COMMISSION'S RULES

OET Docket No. 24-209

About the UWB Alliance

The Ultra Wide Band (UWB) Alliance is a global not-for-profit organization that works to collectively establish ultra-wideband (UWB) technology as an open-standards industry. A coalition made up of vendors that either design, manufacture, or sell products that use ultra-wideband technology, the UWB Alliance aims to promote and protect the current allocation of bandwidth as well as promote the continuing globalization of the technology. As part of our mission, we advocate UWB technology and use cases to promote verticals showing the value of UWB for IoT and Industry 4.0 and to build a global ecosystem across the complete UWB value chain, from the silicon to the service. In addition, the Alliance is promoting and assuring interoperability through its work with Standards Development Organizations such as the IEEE and ETSI and then working with members to define upper layers and testing to assure compliance. For more information, please visit us at www.UWBAlliance.org.

Review of Kontur Waiver Request

We thank the Commission for providing the opportunity to comment on the public notice on the waiver request by Kontur, AS¹.

We favor granting of the waiver petition. We find that the petition provides sound technical analysis, and the request aligns with prior waivers granted by the Commission as enumerated in the petition. The petition is substantially similar to many already issued, and the technical background is sound.

We agree with Kontur's analysis that use of frequency-hopping modulation will improve the performance and speed of the device, while also not increasing the potential for interference². We also believe that frequency diversity can improve coexistence performance and potentially reduce impact on other users, particularly narrow band users. The specific limits on transmit power and power spectral density continue to protect licensed users with the frequency diversity feature enabled and the per-channel bandwidth as specified.

We urge the Commission to grant this waiver.

Respectfully Submitted,

Tim Harrington, Chairman
Ultra Wide Band Alliance

¹ OFFICE OF ENGINEERING AND TECHNOLOGY SEEKS COMMENT ON KONTUR, AS PETITION FOR WAIVER OF SECTIONS 15.503(D), 15.31(C), AND 15.521(D) OF THE COMMISSION'S RULES
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<https://docs.fcc.gov/public/attachments/DA-24-665A1.pdf>

² Kontur, AS Petition for Waiver of Sections 15.503(d), 15.31(c), and 15.521(d) of the Commission's Rules, ET Docket No. 24-209 (filed Jan.. 23, 2023), <https://www.fcc.gov/ecfs/search/search-filings/filing/10123226735873> (Kontur Waiver Request).