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Record Type: Record

To: John Morrall@EOP

cc:

Subject: Suggestion for Regulatory Reform

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Name of Guidance:

FCC Docket # 98-153 - UWB Ruling

Regulating Agency:

FCC

Subagency (if any):

Citation (Code of Federal Regulation):

FCC Docket # 98-153

Authority (Statute/Regulation):

Description of Problem (Nature of Impact and on Whom):

This rule arbitrarily bans the use of Ground Penetrating Radar GPR by geophysicists - the only group that uses and has used it for the past 30 years. This rule will eliminate a highly valuable service, necessary for public safety and vital to the continuation of a long standing industry.

In effect, this ruling will put myself and several thousand other GPR service providers and manufacturers out of business. Since we are the only people currently using these devices, the distinctive lack of any representation from our industry and the apparent dismissive attitude of the FCC suggests that the driving force behind this ruling may be some special interest attempting to monopolize an emerging technology as

mentioned above, a technology in widespread use for the past 3 decades.

Proposed Solution:

This rule arbitrarily bans the use of Ground Penetrating Radar GPR by geophysicists - the only group that uses and has used it for the past 30 years. This rule will eliminate a highly valuable service, necessary for public safety and vital to the continuation of a long standing industry.

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Estimate of Economic Impacts (Quantified Benefits and Costs if possible / Qualified description as needed):

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