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28 March 2007

**Contribution to the Public Consultation Paper:
Regulatory framework for devices using Ultra Wideband technology
1st March 2007**

Ladies and gentlemen,

following you will find a contribution on your a.m. document.

It expresses the view of the Robert Bosch GmbH on the implementation of the UWB technology in your country.

Taking into account that today products are for seen to be introduced in a world wide market and therefore have to be compliant to relevant regulatory issues.

It is related to the existing regulatory framework and decisions of the CEPT ECC which have been done already or are under work in Europe today.

Yours sincerely

Hartmut Dunger
Robert Bosch GmbH

**Contribution from Robert Bosch GmbH to the
Public Consultation Paper of iDA, Singapore.**

Regulatory Framework for devices using Ultra-Wideband technology (1st
March 2007)

Comments to:

1. Part II: Background, bullet 3. :
..In general ist can be broadly categorised in 3 Types
...2)imaging and sensor systems; and ...
Include the family of UWB sensor applications.
(Numbering of the types of UWB application not consistent
throughout the document: change between type 2 and type 3 later
on)
2. Part III Question 1:
Several impact and compatibility studies show the possibility of
coexistence between existing radio services (e.g. FSS, FS) and
devices using UWB technology.
Therefore Robert Bosch GmbH fully supports the intention of iDA
3. Part III Question 2:
Scenarios can be derived out of the realistic usage, not necessarily
worst case, of the application and simulated with Monte Carlo
algorithm. Then additional application depending mitigation factors
can be taken in to account. This is successfully done in Europe
with the CEPT supported tool SEAMCAT¹.
4. Part III Question 3:
Other than license-exempt approaches for mass market products
seems not to be practical.
5. Part III Question 4:
Robert Bosch GmbH fully supports this proposal.
6. Part III Question 6:
A decision on the necessity of licensing on a case by case basis for
imaging applications using other frequencies then 3.1 GHz up to
10.6 GHz and other power levels may be help full for niche market
products which interference potential to existing radio services is
expected to be very low (lower or higher peak power, lower density
(lower market penetration), frequency range below 3.1 GHz).

¹ European Radiocommunication Office (ERO) SEAMCAT: www.ero.dk



Example for an imaging application in Europe: Building Material Analysis (BMA)^{2,3} application, which works between 2.2 GHz to 8 GHz with -50dBm/MHz and a Listen Before Talk (LBT) mechanism as a mitigation for active radio services like IMT2000 or Mobile Satellite Service on a license-exempt basis.

7. Part III question 7:
It depends on the restrictive requirements of the licensing scheme. This may lead to an expensive/complicated formal handling or procedure of the device before usage and therefore to a non acceptance of the user/market.

8. Part III question 8:
See question 7

² Draft CEPT ECC decision on BMA: ECC(07) TEMP 03 Rev1 (www.ero.dk)

³ Standard ETSI EN 302 435