

Appendix C GPR Emissions, Interference and Regulations

All governments have regulations on the level of electromagnetic emissions that an electronic apparatus can emit. The objective is to assure that one apparatus or device does not interfere with any other apparatus or device in such a way as to make the other apparatus non-functional.

Sensors & Software Inc. extensively test their pulseEKKO, Noggin and Conquest subsurface imaging products using independent professional testing houses and comply with latest regulations of the USA, Canada, European Community, and other major jurisdictions on the matter of emissions.

GPR instruments are considered to be UWB (ultra-wideband) devices. The regulatory regimes worldwide are devising new rules for UWB devices. Sensors & Software Inc. maintains close contact with the regulators to help guide standard development and assure that all products conform. You should continually monitor the "News" link on our website (www.sensoft.ca) for updates on standards.

Electronic devices have not always been designed for proper immunity. If a GPR instrument is placed in close proximity to an electronic device, interference may occur. While there have been no substantiated reports of interference to date, if any unusual behavior is observed on nearby devices, test if the disturbance starts and stops when the GPR instrument is turned on and off. If interference is confirmed, stop using the GPR.

Where specific jurisdictions have specific GPR guidelines, these are described below.

C-1 FCC Regulations (USA)

This device complies with Part 15 of the USA Federal Communications Commission (FCC) Rules. Operation in the USA is subject to the following two conditions:

- (1) this device may not cause harmful interference and
- (2) this device must accept any interference received, including interference that may cause undesired operation.

Part 15 – User Information

This equipment has been tested and found to comply with the limits for a Class A digital device, where applicable, and for an ultrawide bandwidth (UWB) device where applicable, pursuant to Part 15 of the FCC Rules. These limits are designed to provide reasonable protection against harmful interference when the equipment is operated in a commercial environment. This equipment generates, uses and can radiate radio frequency energy and, if not installed and used in accordance with the instruction manual, may cause harmful interference to radio communications. Operation of this equipment in a residential area is likely to cause harmful interference in which case the user will be required to correct the interference at his own expense.

WARNING

Changes or Modifications not expressly approved by Sensors & Software Inc. could void the user's authority to operate the equipment.

Certification of this equipment has been carried out using approved cables and peripheral devices. The use of non-approved or modified cables and peripheral devices constitutes a Change or Modification outlined in the warning above.

Operating Restrictions

Operation of this device is limited to purposes associated with law enforcement, fire fighting, emergency rescue, scientific research, commercial mining, or construction. Parties operating this equipment must be eligible for licensing under the provisions of Part 90 of this chapter.

FCC Interpretation of Operation Restrictions issued July 12, 2002 (FCC Order DA02-1658, paragraph 9)

The regulations contain restrictions on the parties that are eligible to operate imaging systems.¹ Under the new regulations, GPRs and wall imaging systems may be used only by law enforcement, fire and emergency rescue organizations, by scientific research institutes, by commercial mining companies, and by construction companies. Since the adoption of the *Order*, we have received several inquiries from the operators of GPRs and wall imaging systems noting that these devices often are not operated by the users listed in the regulations but are operated under contract by personnel specifically trained in the operation of these devices. We do not believe that the recent adoption of the UWB rules should disrupt the critical safety services that can be performed effectively only through the use of GPRs and wall imaging systems. We viewed these operating restrictions in the broadest of terms. For example, we believe that the limitation on the use of GPRs and wall imaging systems by construction companies encompasses the inspection of buildings, roadways, bridges and runways even if the inspection finds no damage to the structure

1. See 47 C.F.R. §§15.509(b), 15.511(b), and 15.513(b)

and construction does not actually result from the inspection; the intended purpose of the operation of the UWB device is to determine if construction is required. We also believe that the GPRs and wall imaging systems may be operated for one of the purposes described in the regulations but need not be operated directly by one of the described parties. For example, a GPR may be operated by a private company investigating forensic evidence for a local police department.

FCC Permitted Mode of Usage

The GPR antenna must be kept on the surface to be in compliance with FCC regulations. Use of the antenna is not permitted if it is lifted off the surface. Use as a through-the-wall imaging device is prohibited.

GPR Use Coordination

FCC regulation 15.525(c) (updated in February 2007) requires users of GPR equipment to coordinate the use of their GPR equipment as described below:

TITLE 47--TELECOMMUNICATION

CHAPTER I--FEDERAL COMMUNICATIONS COMMISSION

PART 15_RADIO FREQUENCY DEVICES

Subpart F_Ultra-Wideband Operation Sec.

15.525 Coordination requirements.

(a) UWB imaging systems require coordination through the FCC before the equipment may be used. The operator shall comply with any constraints on equipment usage resulting from this coordination.

(b) The users of UWB imaging devices shall supply operational areas to the FCC Office of Engineering and Technology, which shall coordinate this information with the Federal Government through the National Telecommunications and Information Administration. The information provided by the UWB operator shall include the name, address and other pertinent contact information of the user, the desired geographical area(s) of operation, and the FCC ID number and other nomenclature of the UWB device. If the imaging device is intended to be used for mobile applications, the geographical area(s) of operation may be the state(s) or county(ies) in which the equipment will be operated. The operator of an imaging system used for fixed operation shall supply a specific geographical location or the address at which the equipment will be operated. This material shall be submitted to:

Frequency Coordination Branch, OET
Federal Communications Commission
445 12th Street, SW, Washington, D.C.
20554
Attn: UWB Coordination

(Sensors & Software Inc. Note: The form given on the following page is a suggested format for performing the coordination.)

(c) The manufacturers, or their authorized sales agents, must inform purchasers and users of their systems of the requirement to undertake detailed coordination of operational areas with the FCC prior to the equipment being operated.

(d) Users of authorized, coordinated UWB systems may transfer them to other qualified users and to dif-

ferent locations upon coordination of change of ownership or location to the FCC and coordination with existing authorized operations.

(e) The FCC/NTIA coordination report shall identify those geographical areas within which the operation of an imaging system requires additional coordination or within which the operation of an imaging system is prohibited. If additional coordination is required for operation within specific geographical areas, a local coordination contact will be provided. Except for operation within these designated areas, once the information requested on the UWB imaging system is submitted to the FCC no additional coordination with the FCC is required provided the reported areas of operation do not change. If the area of operation changes, updated information shall be submitted to the FCC following the procedure in paragraph (b) of this section.

(f) The coordination of routine UWB operations shall not take longer than 15 business days from the receipt of the coordination request by NTIA. Special temporary operations may be handled with an expedited turn-around time when circumstances warrant. The operation of UWB systems in emergency situations involving the safety of life or property may occur without coordination provided a notification procedure, similar to that contained in Sec. 2.405(a) through (e) of this chapter, is followed by the UWB equipment user.[67 FR 34856, May 16, 2002, as amended at 68 FR 19751, Apr. 22, 2003]

Effective Date Note: At 68 FR 19751, Apr. 22, 2003, Sec. 15.525 was amended by revising[[Page 925]]paragraphs (b) and (e). This amendment contains information collection and recordkeeping requirements and will not become effective until approval has been given by the Office of Management and Budget.

FCC GROUND PENETRATING RADAR COORDINATION NOTICE

NAME:

ADDRESS:

CONTACT INFORMATION [CONTACT NAME AND PHONE NUMBER]:

AREA OF OPERATION [COUNTIES, STATES OR LARGER AREAS]:

FCC ID: [E.G. QJQ-NOGGIN250 FOR NOGGIN 250 SYSTEM]

EQUIPMENT NOMENCLATURE: [E.G. NOGGIN 250]

Send the information to:

Frequency Coordination Branch., OET
Federal Communications Commission
445 12th Street, SW
Washington, D.C. 20554
ATTN: UWB Coordination
Fax: 202-418-1944

INFORMATION PROVIDED IS DEEMED CONFIDENTIAL