

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

In the Matter of)	
)	
Office of Engineering and Technology)	ET Docket No. 18-70
Seeks Comment on Google’s Request for)	
Waiver of Section 15.255(c)(3) of the)	
Commission’s Rules for Radars Used for)	
Interactive Motion Sensing in the 57-64)	
GHz Band)	
)	

COMMENTS OF FACEBOOK, INC.

Facebook, Inc. (Facebook) hereby provides comments to Google LLC’s (Google) request for waiver of Section 15.255(c)(3) of the Commission’s rules.¹ Facebook respectfully submits that further study of potential interference caused by operation of short-range devices (SRDs) at the power levels requested by Google is required prior to grant of its waiver request. As noted by IEEE 802, the request is “unsupported by data to show the impact of this service on other unlicensed users using the band.”² For example, the interference analysis submitted by Google does not appear to consider possible interference with point-to-point communications between SRDs in close proximity that are operating in the 57-64 GHz band.³ We believe a more careful technical evaluation is necessary before moving forward.

¹ Request by Google LLC for Waiver of Section 15.255(c)(3) of the Commission’s Rules (Mar. 7, 2018) (Waiver Request); 47 C.F.R. § 15.255(c)(3).

² Comments of IEEE 802, ET Docket No. 18-70, at 1 (Apr. 11, 2018).

³ See, e.g., Waiver Request, Simulation Study at 9, Figure 2.

Respectfully submitted,

/s/ Alan Norman

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