

September 7, 2018

**Via Electronic Filing**

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 Twelfth Street SW  
Washington, D.C. 20554

**Re: Request by Google LLC For Waiver of Section 15.255(c)(3) Of the Commission's Rules (ET Dkt. No. 18-70)**

Dear Ms. Dortch,

Both Google LLC (Google) and Facebook, Inc. (Facebook) are enthusiastic about the promise of unlicensed 60 GHz spectrum for deployment of new technologies. In this docket, Google has requested a waiver to enable one such technology,<sup>1</sup> and Facebook has raised concerns about coexistence with other such technologies.<sup>2</sup> In light of those filings and with the encouragement of Commission staff, Google and Facebook have engaged in discussions about their respective positions. Google continues to see the value in global harmonization of standards,<sup>3</sup> while Facebook continues to have concerns about potential operation of Project Soli sensors at ETSI Standard EN 305 550 power levels.<sup>4</sup> Nevertheless, both companies agree that Project Soli sensors could

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<sup>1</sup> Request by Google LLC For Waiver of Section 15.255(c)(3) of the Comm'n's Rules in ET Docket No. 18-70 (filed Mar. 7, 2018) (Petition).

<sup>2</sup> See, e.g., Comments of Facebook, Inc. in ET Docket No. 18-70 (filed Apr. 11, 2018); Reply Comments of Facebook, Inc. in ET Docket No. 18-70 (filed Apr. 23, 2018); Letter from Alan Norman, Facebook Inc., to Marlene H. Dortch, Secretary, FCC, in ET Docket No. 18-70 (July 20, 2018).

<sup>3</sup> See, e.g., Petition at 4; Letter from Megan Anne Stull, Counsel, Google LLC to Marlene H. Dortch, Secretary, FCC, in ET Docket No. 18-70 at 1 (filed June 8, 2018).

<sup>4</sup> ETSI, *Electromagnetic Compatibility and Radio Spectrum Matters (ERM); Short Range Devices (SRD); Radio Equipment to be Used in the 40 GHz to 246 GHz Frequency Range; Part 2: Harmonized EN Covering the Essential Requirements of Article 3.2 of the R&TTE Directive*, ETSI EN 305 550-2 V1.2.1 (Oct. 2014), at [http://www.etsi.org/deliver/etsi\\_en/305500\\_305599/30555002/01.02.01\\_60/en\\_30555002v010201p.pdf](http://www.etsi.org/deliver/etsi_en/305500_305599/30555002/01.02.01_60/en_30555002v010201p.pdf) (EN 305 550); ETSI, *Short Range Devices (SRD); Radio Equipment to be Used in the 40 GHz to 246 GHz Frequency Range; Harmonised Standard for Access to Radio Spectrum*, EN 305 550, V2.1.0 (Oct. 2017), at [http://www.etsi.org/deliver/etsi\\_en/305500\\_305599/305550/02.01.00\\_20/](http://www.etsi.org/deliver/etsi_en/305500_305599/305550/02.01.00_20/)

operate within the following parameters without causing levels of interference that Facebook's previous filings characterized as unreasonable:

- Peak EIRP: +13dBm
- Peak transmitter conducted power: +10dBm
- Peak power-spectral density: +13dBm/MHz
- Maximum Transmit Duty Cycle: 10% in any 33ms interval (i.e., Soli sensors will not transmit longer than a total of 3.3ms in any 33ms time period)

Google has concluded that a waiver under the above conditions would allow users in the United States to have an experience sufficiently comparable to that enjoyed by users in other countries when operating today's Project Soli technology. Facebook has concluded that the above conditions would enable coexistence between Project Soli devices subject to the requested waiver and the technologies described in Facebook's prior comments.

Please do not hesitate to contact the undersigned with any questions.

Sincerely,



Megan Anne Stull  
*Counsel*  
*Google LLC*



Pankaj Venugopal  
*Associate General Counsel*  
*Facebook, Inc.*