IEEE 802.18

Radio Regulatory Technical Advisory Group

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| Reply Comments on FCC 21-264 NPRM Amendment of Section 15.255 of the Commission’s RulesFCC Seeks to Enable State-of-the-Art Radar Sensors in 60 GHz Band |
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| Reply Comments of IEEE 802-60 GHz motion sensing FCC NPRM ET 21-264 |
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Abstract

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**Before the**

**Federal Communications Commission**

**Washington, D.C. 20554**

In the Matter of )

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Amendment of Section 15.255 of the ) ET Docket No. 21-264

Commission’s Rules )

**Reply Comments of IEEE 802**

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Standards Committee

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xx October 2021 *[Note: to be filled in when the letter is finalized]*

The IEEE 802 LAN/MAN Standards Committee (LMSC) is pleased to submit these reply comments in response to the Commission’s NPRM proposing to permit greater flexibility for radar operations in the 57-64 GHz band while continuing to ensure that this unlicensed band continues to support important communications applications, such as IEEE 802.11ad, IEEE 802.11ay, and IEEE 802.15.3c (“IEEE 802-based 60 GHz technologies”)[[1]](#footnote-1).

IEEE 802 LMSC is a leading consensus-based industry standards body, producing standards for wireless networking devices, including wireless local area networks (“WLANs”), wireless specialty networks (“WSNs”), wireless metropolitan area networks (“Wireless MANs”), and wireless regional area networks (“WRANs”). We appreciate the opportunity to provide these reply comments to the Commission.

IEEE 802 is a committee of the IEEE Standards Association and Technical Activities, two of the Major Organizational Units of the Institute of Electrical and Electronics Engineers (IEEE). IEEE has about 420,000 members in about 190 countries and supports the needs and interests of engineers and scientists broadly. In submitting this document, IEEE 802 acknowledges and respects that other components of IEEE Organizational Units may have perspectives that differ from, or compete with, those of IEEE 802. Therefore, this submission should not be construed as representing the views of IEEE as a whole.[[2]](#footnote-2)

Should the FCC move forward with its proposal to enable higher-power radar operations in the 60 GHz band, the FCC should also ensure that its technical rules allow sharing with all types of unlicensed communications applications, including IEEE 802-based 60 GHz technologies such as IEEE 802.11ad, IEEE 802.11ay, and IEEE 802.15.3c. IEEE 802 believes that to ensure coexistence between radar and unlicensed communications technologies in the 60 GHz band, the FCC must close the current loophole in its proposed 10% duty cycle limit. To do so, the FCC should implement the “2 ms condition,” as it has in its most recent waiver decisions,[[3]](#footnote-3) into its final rules.

1. **The 10% Duty Cycle Proposal Contains a Loophole that Would Allow a Much Higher Effective Duty Cycle.**

As noted on the record, the duty cycle definition in the Commission’s NPRM contains a loophole.[[4]](#footnote-4) Specifically, the duty cycle definition in the proposed rule permits a radar device to meet the 10% duty cycle limit with, for example, a 10 µs transmission (on) time and a 90 µs off time, which would effectively block or corrupt communications in the same room or vehicle. This is because the short off time, which is on the order of a fraction of a millisecond, will effectively prevent communication applications from accessing the medium for much longer periods of time or repetitively interrupt and corrupt the communication sequences which generally requires certain minimum time to complete.  As a result, applications that make use of IEEE 802-based 60 GHz technology would experience an increase in latency, which would be particularly harmful to highly immersive AR/VR/XR applications.  It should be noted that the impact of the duty cycle loophole is exacerbated by the fact that FMCW radar systems sweep the entire 57-64 GHz band and transmit without any form of channel sensing.  Thus, there is a need to better define the duty cycle terms for radar systems such that any transmission gap below such off-time limit is deemed to be part of the transmission on time.

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1. **IEEE 802 Supports Closing this Loophole with the “2 ms Condition” the FCC Has Used in Recent Waiver Conditions.**

To address the issue identified above, the FCC should adopt the additional “2 ms condition” that it has included in its most recent waiver grants[[5]](#footnote-5) (#2 below) on any higher power radar system it proposes to permit within the 57 to 64 GHz portion of the band, as set out in #1 below:

1. A radar device may operate in the 57-64 GHz band at a maximum +13 dBm EIRP, +10 dBm transmitter conducted output power, and +13 dBm/MHz power spectral density, so long as the radar device does not exceed a transmit duty cycle (i.e., on-time/[on-time + off-time]) of 10% in any 33 ms interval (i.e., the device will not transmit longer than a total of 3.3 ms).
2. Any radar off-time period between two successive radar pulses that is less than 2 ms shall be considered “on time” for purposes of computing the duty cycle.

This additional condition is necessary to ensure that radar devices do not transmit with an effective duty cycle greatly in excess of the 10% limit and thus lock out communications applications in the 57 to 64 GHz band.

# Conclusion:

IEEE 802 thanks the Commission for providing an opportunity to comment on the NPRM ET Docket 21-264 and respectfully requests these reply comments be considered by the Commission during the final rule making process.

Regards,

By: /ss/ .

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1. *See Amendment of Section 15.255 of the Commission’s Rules*, Notice of Proposed Rulemaking ET Docket No. 21-264, FCC 21-83 (rel. July 14, 2021) (“NPRM”). [↑](#footnote-ref-1)
2. This document solely represents the views of the IEEE 802 LAN/MAN Standards Committee and does not necessarily represent a position of either the IEEE, the IEEE Standards Association or IEEE Technical Activities. [↑](#footnote-ref-2)
3. *See* FCC OET Letter Granting Petition of Faurecia Clarion Electronics North America regarding 47 CFR § 15.255, ET Docket No. 21-288, DA 21-811 (rel. July 9, 2021); *see also* FCC OET Letter Granting Request by Texas Instruments Incorporated for Waiver of 47 CFR § 15.255(c)(3), ET Docket No. 21-290, DA 21-813 (rel. July 9, 2021); FCC OET Letter Granting Request by Amazon.com Services LLC for Waiver of 47 CFR § 15.255(c)(3), ET Docket No. 21-289, DA 21-813 (rel. July 9, 2021); FCC OET Letter Granting Request by Vayyar Imaging Ltd. for Waiver of 47 CFR § 15.255 rules, ET Docket No. 20-15, DA 21-815 (rel. July 9, 2021); Request by Huyndai Mobis Co., Ltd. for Waiver of 47 CFR §§ 15.255(a)(2) & (c)(3), ET Docket No. 21-287, DA 21-816 (rel. July 9, 2021). For narrow pulse radio radar devices, the IEEE 802 supports the technical parameters in the recent OET Letter Order to Acconeer. *See* FCC OET Letter Granting Request by Acconeer AB for Waiver of 47 CFR § 15.255(c)(3) rules, ET Docket No. 21-48, DA 21-814 (rel. July 9, 2021). [↑](#footnote-ref-3)
4. NPRM ¶ 15. [Add Cite to Qualcomm, Intel, FB joint comments] [↑](#footnote-ref-4)
5. See supra note 3. [↑](#footnote-ref-5)