

FEDERAL COMMUNICATIONS COMMISSION
445 12th Street SW, Washington, DC 20554

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Cambridge MA, 22 oktober 2018

Regarding:

COMMENTS of Prodrive Technologies Inc. on PETITION for RULEMAKING

In the Matter of Amendment of the Commission's Rules to Allow Next-Generation Wireless Charging Technology for Electric Vehicles Under Part 18
RM-11815

Comments of Prodrive Technologies.

As a manufacturer of wireless power transfer (WPT) systems for electric vehicles (EVs), Prodrive Technologies agrees that WPT systems will have a positive impact on consumer adaptation of electric vehicles. Prodrive Technologies agrees that defining limits specifically for WPT will stimulate development and enable high power wireless charging for EVs.

Prodrive Technologies is involved in a number of standardization organizations including SAE, CISPR, IEC, and ISO.

Prodrive Technologies agrees with most of the content of the petition but would like to point out the following:

- The (draft) standards in SAE, CISPR, IEC and ETSI propose a limit equal to 82.8dB μ A/m for the WPT3 (11 kW) power class of WPT systems. This is also the limit studied in the ECC report 289.

In the interest of harmonization of the various international standards, Prodrive Technologies believes that adaptation of the limit to 82.8dB μ A/m is a preferable change to the Petition for Rulemaking request for the FCC amend Part 18 regulations.

- In the (draft) CISPR and ETSI standards an alternative measurement method is described then provided in the Petition for Rulemaking, i.e.
 - A more convenient measurement distance at 10 m is described, which increases the feasibility for performing the measurements at a higher number of laboratories.
 - Additionally, the allowed field limits are prescribed in magnetic field strength (H-field) in [dB μ A/m] instead of the electrical field strength (E-field) in [μ V/m].

Also here in the interest of harmonization of the various international standards, Prodrive Technologies believes that adaptation of the measurement method according to the CISPR and ETSI standards, is a preferable change to the Petition for Rulemaking request for the FCC amend Part 18 regulations.

Thank you in advance for taking our statement into consideration.

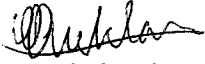
Kind regards,

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OCT 26 2018

FCC Mail Room

<p>Paul van Bavel Compliance and conformity engineering</p> <p>Dated: October 22, 2018</p> <p>Prodrive Technologies Science Park Eindhoven 5501 5692 EM Son The Netherlands</p>	<p>Vincent Drietelaar Business Development Manager</p> <p></p> <p>Dated: October 22, 2018</p> <p>Prodrive Technologies Inc. 1 Broadway, 14th Floor Cambridge MA, 02142 USA</p>
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On October 22, 2018, one copy of the foregoing comments of Prodrive Technologies Inc. was sent via First-Class mail to the following individuals:

James H. Barker
LATHAM & WATKINS LLP
555 Eleventh Street, NW, Suite 100
Washington, DC 20004
Counsel for Petitioners

Roberto Rossetti
Vice President Engineering
BMW OF NORTH AMERICA, LLC
200 Chestnut Ridge Rd, Building 150
Woodcliff Lake, NJ 07677

Bob Holycross
Global Director, Sustainability and
Vehicle Environmental Matters
FORD MOTOR COMPANY
World Headquarters, 218-A6
One American Road
Dearborn, MI 48126

Christopher Reed
Vice President – Platform & Technology
Engineering
NISSAN NORTH AMERICA, INC.
39001 Sunrise Drive
Farmington Hills, MI 48331

Kevin Webber
Director – Product Regulatory Affairs
TOYOTA MOTOR NORTH AMERICA, INC.
1555 Woodridge Avenue
Ann Arbor, MI 48105