

April 25, 2018

VIA ELECTRONIC FILING

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street SW  
Washington, DC 20554

RE: **Ex Parte Presentation**: Request by Google LLC for Waiver of Section 15.255(c)(3) of the Commission's Rules, ET Docket No. 18-70

Dear Ms. Dortch:

On April 24, 2018, I made a telephone call to Julius Knapp, Chief of the Office of Engineering and Technology, as well as Jamison Prime, Legal Advisor, Office of Engineering and Technology. On this call, I discussed the points made in the Reply Comments of Facebook, Inc. filed on April 23, 2018 in the above-referenced proceeding.<sup>1</sup>

Google LLC ("Google") has requested a waiver of Section 15.255(c)(3) of the Commission's rules<sup>2</sup> in order to operate its Project Soli radars at higher power levels. Facebook has concerns with this request and asks the Commission to study these concerns. Google's waiver request and supporting simulation study do not address the potential impact of Soli radars operating at the requested power levels on point-to-point communications between short-range devices ("SRDs") in the band.

We discussed a probable scenario that the Commission should examine: A Soli radar, embedded in a watch or smartphone, could be in close proximity—possibly within centimeters of an SRD transmitter or receiver embedded in a laptop or other handheld device. This close proximity could lead to harmful interference resulting in degraded performance and latency. And given the high likelihood that Soli radars and SRD devices would be located very close together, statistical modeling of interference is unlikely to reveal the true impact of Soli radars on SRD communications. Due to the proprietary aspects of Project Soli, the behavior of its coexistence mechanisms is not as well known and merits further empirical testing to substantiate the analytical model. Lastly, I reiterated that Facebook is open to working collaboratively with all stakeholders to study these concerns.

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<sup>1</sup> Reply Comments of Facebook, Inc., ET Docket No. 18-70, (filed Apr. 23, 2018).

<sup>2</sup> 47 C.F.R. § 15.255(c)(3).

Respectfully submitted by:

/s/ Alan Norman

Alan Norman

Facebook, Inc.

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Menlo Park, CA 94025

cc: Julius Knapp  
Jamison Prime