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November 11, 2019

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th Street, S.W.  
Washington, D.C. 20554

Re: *Notice of iRobot Ex Parte Submission of Robertson Report Related to  
Unlicensed Use of the 6 GHz Band, Expanding Flexible Use in the  
Mid-Band Spectrum Between 3.7 and 24 GHz, ET Docket No. 18-295,  
GN Docket No. 17-183*

Dear Ms. Dortch:

Decawave notes with interest the Robertson report submitted by iRobot<sup>1</sup>. Its results are in line with our own previous studies<sup>2</sup>, those presented by the UWB Alliance<sup>3</sup>, and those reported in the European ECC Report 302. If not amended, the proposed rules will seriously affect the viability of ultra-wideband systems operating in the 6 GHz range. Unique functionality, ranging from real-time NFL and college football tracking<sup>4</sup> and vital signs detection<sup>5</sup> to preventing car theft<sup>6</sup>, would be lost.

While we recognise that UWB is a non-protected radio application, we would like to respectfully remind the FCC that in the past unlicensed systems were taken into account when introducing new, licensed systems<sup>7</sup>. If this precedent were to be disregarded,

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<sup>1</sup> iRobot Ex Parte Submission of Robertson Report, submitted Oct 17, 2019 by Tonya Drake to ET Docket No. 18-295 and GN Docket No. 17-183

<sup>2</sup> Comments by Decawave, submitted Feb 15, 2019 to ET Docket No. 18-295 and GN Docket No.17-183

<sup>3</sup> Comments by Ultra Wide Band (UWB) Alliance, submitted Feb 19, 2019 to ET Docket No. 18-295 and GN Docket No.17-183

<sup>4</sup> Comments by Zebra Technologies, submitted Feb 15, 2019 to ET Docket No. 18-295 and GN Docket No.17-183

<sup>5</sup> Comments by Novelda US Inc, submitted Feb 16, 2019 to ET Docket No. 18-295 and GN Docket No. 17-183

<sup>6</sup> Comments by NXP USA Inc, Marquardt GmbH and Decawave to ET Docket No. 18-295 and GN Docket No. 17-183

<sup>7</sup> Reply to comments by The Boeing Company, submitted Mar 19, 2019 to ET Docket No. 18-295 and GN Docket No. 17-183

particularly for the introduction of another unlicensed technology, in future no manufacturer can invest with confidence in the development of unlicensed systems, including ultra-wideband.

Given the significant opposition to the proposed rules including opposition from licensed radio services and other federal bodies, Decawave would like to urge the FCC to proceed cautiously and to repeat its request<sup>8</sup> that the FCC only awards the minimum amount of spectrum required by the *Mobile Now Act*. Should more spectrum be awarded, coexistence with all incumbents should be improved by adding duty cycle and power limitations to the proposed rules as outlined in our previous submission<sup>9</sup>.

Respectfully submitted,

/s/ *Michael McLaughlin*

Decawave  
Michael McLaughlin  
Chief Technical Officer

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<sup>8</sup> Comments by Decawave, submitted Feb 15, 2019 to ET Docket No. 18-295 and GN Docket No. 17-183

<sup>9</sup> Id.



