



PUBLIC NOTICE

Federal Communications Commission
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DA 15-165
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**OFFICE OF ENGINEERING AND TECHNOLOGY DECLARES THE iROBOT REQUEST FOR
A WAIVER OF PART 15 RULES TO BE A “PERMIT-BUT-DISCLOSE” PROCEEDING FOR
EX PARTE PURPOSES AND REQUESTS COMMENTS**

ET Docket No. 15-30

Comment Date: March 9, 2015

Reply Comment Date: March 25, 2015

On January 22, 2015, iRobot Corporation (iRobot) filed a request for a waiver of Section 15.250(c) of the Commission’s rules in order to obtain equipment certification for and market its Robotic Lawn Mowers (RLMs). iRobot states its RLMs are battery operated, self-propelling lawn mowers that rely on portable beacons placed in multiple locations on a lawn. The beacons transmit information to the RLM that enables the RLM to map out and stay within a designated mowing area. The RLMs are designed to operate in the frequency range of 6240-6740 MHz.

Section 15.250 of the Commission’s rules sets out the technical requirements for unlicensed operation of wideband systems within the 5925-7250 MHz band. Section 15.250(c) states that “[e]xcept for operation onboard a ship or a terrestrial transportation vehicle, the use of a fixed outdoor infrastructure is prohibited” for such systems, and that “[a] fixed infrastructure includes antennas mounted on outdoor structures, e.g., antennas mounted on the outside of a building or on a telephone pole.” In its waiver request, iRobot states that its RLMs will be able to operate in the frequency range of 6240-6740 MHz in compliance with all FCC rules except that the RLMs require placement of outdoor portable beacons to operate as designed. iRobot also states that while Section 15.250(c) prohibits “fixed outdoor infrastructure” the use of the portable beacons is consistent with the intent of the rule because it does not establish a wide area communications system or network. iRobot further states that the RLM will not (and cannot) create a wide area communications system or network and thus meets the intent of the rule.

The FCC’s Office of Engineering and Technology (OET) is reviewing the waiver request. OET has concluded that in order to develop a complete record on the issues presented by this request, this proceeding will be treated, for *ex parte* purposes, as "permit-but-disclose" in accordance with Section 1.1200(a) of the Commission's rules, subject to the requirements under Section 1.1206(b).

Pursuant to sections 1.415 and 1.419 of the Commission’s rules, 47 CFR §§ 1.415, 1.419, interested parties may file comments and reply comments on or before the dates indicated on the first page of this document. Comments may be filed using: (1) the Commission’s Electronic Comment Filing System (ECFS), (2) the Federal Government’s eRulemaking Portal, or (3) by filing paper copies. *See Electronic Filing of Documents in Rulemaking Proceedings*, 63 FR 24121 (1998).

- Electronic Filers: Comments may be filed electronically using the Internet by accessing the ECFS: <http://fjallfoss.fcc.gov/ecfs2/> or the Federal eRulemaking Portal: <http://www.regulations.gov>.
- Paper Filers: Parties who choose to file by paper must file an original and four copies of each filing. If more than one docket or rulemaking number appears in the caption of this proceeding, filers must submit two additional copies for each additional docket or rulemaking number.

Filings can be sent by hand or messenger delivery, by commercial overnight courier, or by first-class or overnight U.S. Postal Service mail. All filings must be addressed to the Commission's Secretary, Office of the Secretary, Federal Communications Commission.

- All hand-delivered or messenger-delivered paper filings for the Commission's Secretary must be delivered to FCC Headquarters at 445 12th St., SW, Room TW-A325, Washington, DC 20554. The filing hours are 8:00 a.m. to 7:00 p.m. All hand deliveries must be held together with rubber bands or fasteners. Any envelopes must be disposed of before entering the building.
- Commercial overnight mail (other than U.S. Postal Service Express Mail and Priority Mail) must be sent to 9300 East Hampton Drive, Capitol Heights, MD 20743.
- U.S. Postal Service first-class, Express, and Priority mail must be addressed to 445 12th Street, SW, Washington DC 20554.

People with Disabilities: To request materials in accessible formats for people with disabilities (braille, large print, electronic files, audio format), send an e-mail to fcc504@fcc.gov or call the Consumer & Governmental Affairs Bureau at 202-418-0530 (voice), 202-418-0432 (tty).

All filings must be addressed to the Commission's Secretary, Marlene H. Dortch, Office of the Secretary, Federal Communications Commission, 445 12th Street, S.W., Washington, D.C. 20554. Parties should also send a copy of their filings to Aamer Zain, Office of Engineering and Technology, Federal Communications Commission, Room 7-A201, 445 12th Street, S.W., Washington, D.C. 20554, or by e-mail to aamer.zain@fcc.gov. Parties must also serve one copy with the Commission's copy contractor, Best Copy and Printing, Inc. (BCPI), Portals II, 445 12th Street, S.W., Room CY-B402, Washington, D.C. 20554, (202) 488-5300, or via e-mail to fcc@bcpiweb.com.

Documents in are available for public inspection and copying during business hours at the FCC Reference Information Center, Portals II, 445 12th Street, S.W., Room CY-A257, Washington, D.C. 20554. The documents may also be purchased from BCPI, telephone (202) 488-5300, facsimile (202) 488-5563, TTY (202) 488-5562, e-mail fcc@bcpiweb.com.

Office of Engineering and Technology contact: Aamer Zain at (202) 418-2437.

By the Chief, Office of Engineering and Technology

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