

January 15, 2016

**Via ECFS**

Marlene Dortch, Secretary  
Federal Communications Commission  
445 12th Street, SW  
Washington DC 20554

**Alan G. Fishel**

Partner  
202.857.6450 DIRECT  
202.857.6395 FAX  
[alan.fishel@arentfox.com](mailto:alan.fishel@arentfox.com)

**Re: Ex Parte Filing of UATC, LLC, ET Docket No. 15-26, RM-11666, ET Docket No. 11-90 and RM-11555, ET Docket No. 10-28, and WT Docket No. 11-202**

Dear Ms. Dortch:

On January 13, 2016, David LaRose, Brian Zajac, Ramamurthy Bhagavatula, Matthew Burton, and Patricia Robbins on behalf of UATC, LLC (UATC), and the undersigned, Alan Fishel, Arent Fox, LLP, counsel to UATC, met with the following staff of the Office of Engineering and Technology: Mark Settle, Aspasia Paroutsas, Patrick Forster, Howard Griboff, Karen Rackley, and Matthew Hussey. The purpose of the meeting was to discuss the Notice of Proposed Rulemaking initiated in February 2015 regarding, among other things, radar applications in the 76-81 GHz band.<sup>1</sup>

Mr. Burton explained that Uber Technologies, Inc. (Uber) launched UATC in January 2015 and Mr. LaRose elaborated, explaining that UATC focuses on the development of key long-term technologies that advance Uber's mission of seeking to bring safe, reliable transportation to everyone, everywhere. Today, UATC primarily is conducting work in the areas of mapping, and vehicle safety and autonomy technology.

Mr. LaRose noted that UATC supports the Commission's proposal to allow vehicular radar operations in the 76-81 GHz band, and to license these operations by rule under Part 95. UATC opposes the proposal from the National Radio Astronomy Observatory and the National Academy of Sciences to require vehicles with these radars to have a manual or GPS-determined on/off switch. UATC agrees with other commenters, including the Alliance of Automobile Manufacturers, the Association of Global Automakers, and the Automotive Safety Council, that allowing fixed radar in the 76-77 GHz band, or throughout the 76-81 GHz band, would raise interference concerns for vehicular radar. With respect to whether bands within the 76-81 GHz range should be allocated for short-range vehicular radars (SRR) or long-range vehicular radars

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<sup>1</sup> *Amendment of Parts 1, 2, 15, 90 and 95 of the Commission's Rules to Permit Radar Services in the 76-81 GHz Band et al.*, ET Docket No. 15-26 et al., Notice of Proposed Rulemaking and Reconsideration Order, FCC 15-16 (rel. Feb. 5, 2015).

(LRR), UATC noted that one advantage to distinguishing between SRR and LRR may be that the Commission could more easily consider different technical requirements for LRR at a later point if LRR were assigned to specific frequencies.

UATC is still formulating its view on other aspects of the Commission's proposed rules for vehicular radar in the 76-81 GHz band, particularly with respect to the technical requirements.

This letter is being filed electronically pursuant to Section 1.1206 of the Commission's rules.

Sincerely,

A handwritten signature in blue ink that reads "Alan Fishel". The signature is written in a cursive, flowing style.

Alan G. Fishel

cc: Mark Settle  
Aspasia Paroutsas  
Patrick Forster  
Howard Griboff  
Karen Rackley  
Matthew Hussey