



QUALCOMM Incorporated

1730 Pennsylvania Ave., NW ■ Suite 850 ■ Washington, DC 20006 ■ Tel: 202.263.0022 www.qualcomm.com

March 7, 2016

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

Re: Use of Spectrum Bands Above 24 GHz For Mobile Radio Services, GN Docket No. 14-177, IB Docket Nos. 15-256 & 97-95; RM-11664; WT Docket No. 10-112

Dear Ms. Dortch:

On March 3, 2016, Paul Guckian, Lin Lu, John Forrester, Dean Brenner, and the undersigned of Qualcomm Incorporated spoke via telephone with the following FCC Office of Engineering and Technology staff: Rashmi Doshi, Ed Mantiplay, Bill Hurst, Kwok Chan, and Travis Thul. We discussed RF exposure issues included in the October 23, 2015, *NPRM* in the above-referenced proceedings.

Because FCC rules and test procedures do not account for portable devices that operate in close proximity to users in the millimeter wave bands, Qualcomm urged the FCC to use the limits and test procedures set out in the IEEE and ICNIRP standards for portable device operations in the millimeter wave bands. Qualcomm noted that this view is unanimously supported by all parties who commented on this issue in the above proceedings.¹

Respectfully submitted,

John W. Kuzin

John W. Kuzin

Senior Director & Regulatory Counsel

cc (via email): FCC staff in attendance

¹ See Comments of Ericsson at 17-19; Comments of Mobile Manufacturers Forum; Comments of Nokia at 6, 30-31; Comments of Qualcomm at 18-20; Comments of Straight Path Communications at 44-45; and Comments of Telecommunications Industry Association at 34-35 (filed Jan. 26-28, 2016) and see Reply Comments of Intel at 17; Reply Comments of Straight Path Communications at 29-30 (filed February 26, 2016).