



**QUALCOMM Incorporated**

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March 31, 2016

Ms. Marlene Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> 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 29, 2016, Paul Guckian, Lin Lu, Dean Brenner, and the undersigned of Qualcomm Incorporated met with the following members of the FCC Office of Engineering and Technology: Julius Knapp, Martin Doczkat, Bruce Romano, Rashmi Doshi, and Kwok Chan. 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 (*e.g.*, handheld) devices that operate in the millimeter wave bands, Qualcomm urged the FCC to use the limits and test procedures set out in the ANSI/IEEE and ICNIRP standards for portable device operations in these bands. Qualcomm explained that these standards are used for approvals of portable devices that operate in the millimeter wave bands in the European Union, China, Japan, Brazil, and Canada, among others. Qualcomm also noted that this view is unanimously supported by all parties who commented on this issue in the above proceedings.<sup>1</sup>

Respectfully submitted,

*John W. Kuzin*

John W. Kuzin  
Senior Director & Regulatory Counsel

cc (via email): FCC staff in attendance

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<sup>1</sup> 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; 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).