



June 13, 2014

Marlene H. Dortch, Secretary
Federal Communication Commission
445 Twelfth St. SW
Washington, DC 20554

Re: Ex Parte Presentation, ET Docket No. 13-84
Reassessment of Federal Communications Commission Radiofrequency
Exposure Limits and Policies

Dear Ms. Dortch:

Momentum Dynamics Corporation (“Momentum”) is a small start-up technology company dedicated to developing innovative wireless power charging systems for electric cars, commercial vehicles, and industrial vehicles. Momentum filed Comments and Reply Comments in this proceeding and also in April met with staff to discuss proposals in the Notice of Inquiry (“NOI”) portion of the above-referenced Docket to regulate emissions below 100 kHz for the first time.¹

Momentum’s wireless chargers for electric vehicles are designed to operate in the below 100 kHz frequencies that would be subject to this new regulation. While Momentum has not observed a need for regulation in this range, it nevertheless can support adoption of scientifically sound standards.

The purpose of this letter is to provide the Commission new information related to established scientific standards that govern below 100 kHz. The IEEE Technical Committee 95 has just adopted a new standard (on May 16, 2014) that includes public protection with a significant safety factor for radiators operating between 0 to 100 kHz. This new standard is the most recent to address this subject and is based on the latest scientific research and literature.

¹ See Joint Comments of Momentum Dynamics Corporation and Oak Ridge National Laboratory (September 5, 2013); Joint Reply Comments of Momentum Dynamics Corporation and Oak Ridge National Laboratory (November 18, 2013); and *Ex Parte* Letter dated April 7, 2014.

Significantly, this newly-adopted standard is intended to apply to all 28 NATO countries, 26 of which are within Europe. It will be used to ensure protection of both military personnel and members of the public within military environments in the NATO member countries.² As stated at paragraph 1.3.6.1 of the standard, it applies a total safety factor of 9 for frequencies that include those below 100 kHz – a very conservative factor that can be expected to protect all and then some. The most restrictive zone – “zone 0” – applies “to the general public and uninformed military personnel, become the initiation levels for implementation of personnel protection safety programs, and reflect public concerns that may, in part, support the process of harmonization with national and international guidelines and recommendations.”³

Given that this most recent Standard is based upon all research and data, including the very recent, we hope that if the Commission decides to propose a standard for below 100 kHz, or apply a standard below 100 kHz for other purposes, that it will use this C95.1-2345-2014 IEEE standard as its basis.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read 'Andrew Daga', enclosed within a large, loopy oval shape.

Andrew Daga
CEO

cc: Julius Knapp
Bruce Romano
Robert Weller
Rashmi Doshi
William Hurst
Ed Mantiplay
Martin Doczkat
Karen Rackley
Anh Wride
Kwok Chan
Mark Neumann
Travis Thul

² See IEEE Standard for Military Workplaces – Force Health Protection Regarding Personnel Exposure to Electric, magnetic, and Electromagnetic Fields, 0 Hz to 300 GHz, IEEE Technical Committee 95, IEEE Standard C95.1-2345-2014 (approved May 16, 2014, by the IEEE-SA Standards Board). Copies of this standard are available at:

<http://www.techstreet.com/products/1877546>.

³ *Id.*, at p. 11, within definition of “exposure environment”.