



September 15, 2015

Via Electronic Filing

Roger Noel
Chief, Mobility Division
Wireless Telecommunications Bureau
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

Re: File 1021-EX-ST-2015, Request for Expedited Waiver

Dear Mr. Noel:

On September 14, 2015, Google filed a request for special temporary authority (STA) to conduct experimental operations in a carefully controlled environment (File 1021-EX-ST-2015). The STA request seeks authorization to use 800 MHz band devices aboard unmanned aerial systems (UAS) operating exclusively at low altitude. The proposed use conforms to applicable Commission rules in all respects but one: 47 C.F.R. § 22.925 prohibits operation of Part 22 cellular devices in the 809–849 and 854–894 MHz bands aboard an aircraft while aloft. We understand that the Wireless Telecommunications Bureau accordingly wishes to treat the pending STA as, in part, a request for a waiver of Rule 22.925. We therefore request that the Bureau consider and grant the waiver on an expedited basis, to avoid unnecessary delay of the previously planned testing.

The proposed testing presents no risk of harmful interference to other users or neighboring cellular systems. The testing will occur entirely at altitudes below 400 feet. At that altitude, the transmitters will interact with the cellular network in the same manner as handsets on the ground. Indeed, the airborne transmitters will have no greater capability to reach distant cell sites than if they were carried by a hiker to the top of one of the mountains rising near the test area. The testing, moreover, will be conducted entirely within a limited-access test range.

The mobile carrier providing service to the transmitters at issue in the STA request (and to the surrounding areas) has confirmed that the proposed use does not pose any threat to its cellular network or customers. Google does not propose to operate on frequencies licensed by any other service provider.

For the foregoing reasons, Google asks that, should the Bureau deem it necessary to treat the request for an STA as including a request for a waiver, the necessary waiver be granted expeditiously.

Respectfully submitted,



Aparna Sridhar
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