



PUBLIC NOTICE

Federal Communications Commission
45 L St., N.E.
Washington, D.C. 20554

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DA 22-700
Released: July 5, 2022

OFFICE OF ENGINEERING AND TECHNOLOGY SEEKS COMMENT ON SCHLAGE'S REQUEST FOR WAIVER OF SECTION 15.519(A) AND 15.519(A)(2) OF THE COMMISSION'S RULES FOR HANDHELD UWB SYSTEMS

ET Docket No. 22-248

Comment Date: August 4, 2022
Reply Comment Date: September 6, 2022

By this public notice, we seek comment on a request by the Schlage Lock Company LLC (Schlage) to waive Section of 15.519(a), and 15.519(a)(2) of our rules to obtain a grant of equipment authorization for an ultra-wideband (UWB) door lock system that would operate in the 6-10 GHz frequency range.¹

Schlage describes how it intends to use an impulse radio UWB system to enable peer-to-peer communications between a UWB-enabled access door lock/reader installed on a residential entranceway and a UWB-enabled mobile phone.² Although the system is designed to use 2.4 GHz Bluetooth technology for the phone to discover the reader and engage in data exchange activities (which is not subject to the waiver), the reader will then operate as a UWB device to track the location and movement of the phone's user and determine whether there is a proof of presence, and an intent to enter the secured area.³

Section 15.519(a) of the Commission's rules contains provisions for UWB devices that are relatively small and are primarily handheld while being operated and do not employ a fixed infrastructure, and Section 15.519(a)(2) prohibits the use of antennas mounted on outdoor infrastructure.⁴ Schlage discusses the extent to which the reader can be considered to serve the same purpose as "handheld" devices and how its integrated antenna is different from a permanent pole or tower-mounted apparatus that the rule's prohibition on fixed outdoor infrastructure is clearly designed to prohibit.⁵ It asserts that grant of a waiver will serve the public interest by promoting a

¹ Request by Schlage Lock Company, LLC for Waiver of Section 15.519(a) and 15.519(a)(2) of the Commission's Rules (Schlage Waiver Request). The request was dated April 7, 2022 and posted in the FCC's Electronic Comment Filing System on April 7, 2022.

² Schlage Waiver Request at 3-4. The reader will use directional planar antennas designed for the frequency range from 6 GHz up to 10GHz, which Schlage says will cover "all UWB channels of interest." *Id.* at 4.

³ *Id.* at 3.

⁴ See 47 CFR § 15.519(a) and 15.519(a)(2).

⁵ Schlage Waiver Request at 8-10.

more safe and secure method of gaining property access than what is provided by current technologies.⁶

We seek comment on the Schlage Waiver Request. To develop a complete record on the issues presented by this request, the proceeding will be treated, for *ex parte* purposes, as a “permit-but-disclose” proceeding in accordance with Section 1.1200(a) of the Commission’s rules, subject to the requirements under Section 1.1206(b). Schlage filed its petition electronically as a non-docketed proceeding in the Commission’s Electronic Comment Filing System.⁷ We have opened a new docket, **ET Docket 22-248** to facilitate consideration of this request and have moved Schlage’s submission into this docket. Parties should file all comments and reply comments in **ET Docket 22-248**.

Pursuant to sections 1.415 and 1.419 of the Commission’s rules, 47 CFR §§ 1.415, 1.419, interested parties may file comments and reply comments on or before the dates indicated on the first page of this document. Comments may be filed using the Commission’s Electronic Comment Filing System (ECFS). See *Electronic Filing of Documents in Rulemaking Proceedings*, 63 FR 24121 (1998).

- Electronic Filers: Comments may be filed electronically using the Internet by accessing the ECFS: <http://apps.fcc.gov/ecfs/>.
- Paper Filers: Parties who choose to file by paper must file an original and one copy of each filing. If more than one docket or rulemaking number appears in the caption of this proceeding, filers must submit two additional copies for each additional docket or rulemaking number.

Filings can be sent by commercial overnight courier, or by first-class or overnight U.S. Postal Service mail. All filings must be addressed to the Commission’s Secretary, Office of the Secretary, Federal Communications Commission.

- Effective March 19, 2020, and until further notice, the Commission no longer accepts any hand or messenger delivered filings. This is a temporary measure taken to help protect the health and safety of individuals, and to mitigate the transmission of COVID-19.⁸
- Commercial overnight mail (other than U.S. Postal Service Express Mail and Priority Mail) must be sent to 9050 Junction Drive, Annapolis Junction, MD 20701.
- U.S. Postal Service first-class, Express, and Priority mail must be addressed to 45 L Street, NE, Washington DC 20554.

⁶ *Id.* at 10-11.

⁷ Schlage filed its request in INBOX-PART15 (“Petition for Waiver of Part 15”), which is located under the Non-Docketed Filing tab in the Commission’s Electronic Comment Filing System (ECFS).

⁸ See *FCC Announces Closure of FCC Headquarters Open Window and Change in Hand-Delivery Policy*, Public Notice, 35 FCC Rcd 2788 (OMD 2020), available at <https://docs.fcc.gov/public/attachments/DA-20-304A1.pdf>.

People with Disabilities: To request materials in accessible formats for people with disabilities (braille, large print, electronic files, audio format), send an e-mail to fcc504@fcc.gov or call the Consumer & Governmental Affairs Bureau at 202-418-0530 (voice), 202-418-0432 (tty).

Parties should also send a copy of their filings to Syed S. Hasan, Office of Engineering and Technology, Federal Communications Commission, 45 L Street, NE, Washington DC 20554, or by e-mail to syed.hasan@fcc.gov. Documents associated with this docket will be available for public inspection through the Commission's ECFS.

By the Acting Chief, Office of Engineering and Technology

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