

**DECLARATION OF [REDACTED]**

I, [REDACTED] hereby submit this declaration in connection with Google Inc.'s ("Google") responses to the Federal Communications Commission's requests for information in File No. EB-10-IH-4055. I declare as follows:

1. [REDACTED]  
[REDACTED]

2. [REDACTED]  
[REDACTED]

[REDACTED] I understood that the purpose of the equipment was to identify Wi-Fi access points as the cars drove along, but I was not responsible for the Wi-Fi project or its functionality. From the Street View engineering perspective, our goal was to ensure the Wi-Fi equipment did not interfere with image collection by Street View cars.

3. I did not know that the Wi-Fi equipment installed onboard Street View vehicles could collect payload data, or that the equipment had been programmed to collect payload data from open Wi-Fi networks. I am aware that the engineer responsible who wrote the gstumbler software for use on the Street View cars, [REDACTED] prepared a design document for the project, but I do not recall reading it. Wi-Fi data collection was not within my job purview. It was not until May 2010 that I first realized that payload data from open Wi-Fi networks had been collected by Street View vehicles.

I declare under penalty of perjury that the foregoing is true and correct. Executed on August 30, 2011.

[REDACTED]

**DECLARATION OF [REDACTED]**

I, [REDACTED] hereby submit this declaration in connection with Google Inc.'s ("Google") responses to the Federal Communications Commission's requests for information in File No. EB-10-IH-4055. I declare as follows:

1. [REDACTED]

[REDACTED] Street View at the time it was proposed to use the vehicles as a platform to collect Wi-Fi access point locations for use in location-based services like Maps.

2. [REDACTED] I was aware that Google had outfitted Street View vehicles with devices that would allow them to identify Wi-Fi access points the cars drove past.

3. I was not aware at that time, however, that the Wi-Fi equipment onboard Street View vehicles could receive payload data as well, or that the equipment had been programmed to collect payload data from open Wi-Fi networks. I only learned in May 2010 that payload data from open Wi-Fi networks had actually been collected by Street View vehicles.

I declare under penalty of perjury that the foregoing is true and correct. Executed on August 30, 2011.

[REDACTED]

**DECLARATION OF** [REDACTED]

I, [REDACTED] hereby submit this declaration in connection with Google Inc.'s ("Google") responses to the Federal Communications Commission's requests for information in File No. EB-10-IH-4055. I declare as follows:

1. [REDACTED]  
[REDACTED]  
[REDACTED]

2. [REDACTED] I recall reviewing the gstumbler source code, which was written by [REDACTED]. In accordance with standard Google procedures, my review was limited to checking the code for proper syntax and de-bugging before the code was checked it into Google's source code repository. It was not my responsibility to review the functionality of the gstumbler code, and I did not notice that one of the features of gstumbler was the collection of unencrypted Wi-Fi communications. I have no recollection of reviewing the Wi-Fi Project design document that I understand [REDACTED] drafted and circulated, and it was not part of my duties to do so.

I declare under penalty of perjury that the foregoing is true and correct. Executed on August 30, 2011.

[REDACTED]

**DECLARATION OF [REDACTED]**

I, [REDACTED] hereby submit this declaration in connection with Google Inc.'s ("Google") responses to the Federal Communications Commission's requests for information in File No. EB-10-IH-4055. I declare as follows:

1. [REDACTED]

[REDACTED]

2. [REDACTED]

[REDACTED] a separate team was working on collecting public Wi-Fi access point information through Street View vehicles for the same reason. The Street View project was also beginning around this time and Street View vehicles were seen as a platform that could be used for collecting these public signals. Equipment was installed on the vehicles to do just that.

3. I did not know that the Wi-Fi equipment placed onboard Street View vehicles received payload data, or that the equipment had been programmed to collect payload data from open Wi-Fi networks. I am aware that there was a design document prepared for the Wi-Fi collection, but I do not recall reading it. I did not ask that payload information be collected and it served no purpose for my projects. I am not aware of anyone else asking for payload information to be collected, and I only learned that payload data actually had been collected when various news outlets reported in May 2010 that the Street View vehicles were collecting Wi-Fi communications sent over open networks.

I declare under penalty of perjury that the foregoing is true and correct. Executed on August 31, 2011.

[REDACTED]

**DECLARATION OF [REDACTED]**

I, [REDACTED] hereby submit this declaration in connection with Google Inc.'s ("Google") responses to the Federal Communications Commission's requests for information in File No. EB-10-IH-4055. I declare as follows:

1. [REDACTED]

[REDACTED] on the Street View vehicles.

2. In 2007, a configuration file related to the code that runs in the Street View vehicles was updated. The update concerned new Wi-Fi equipment that had been added to the vehicles. I pushed the revised configuration file to the Street View vehicles that were in the field. I did not review the configuration file, which I understand was written by [REDACTED] as doing so was not part of my job for Wi-Fi software. I only became aware that payload data had been collected when various news outlets reported that the Street View vehicles were collecting Wi-Fi communications sent over unencrypted networks in May 2010.

I declare under penalty of perjury that the foregoing is true and correct. Executed on August 31, 2011.

[REDACTED]

**DECLARATION OF** [REDACTED]

I, [REDACTED] hereby submit this declaration in connection with Google Inc.'s ("Google") responses to the Federal Communications Commission's requests for information in File No. EB-10-IH-4055. I declare as follows:

1. [REDACTED]

2. [REDACTED]

[REDACTED]

[REDACTED]

3. The program simply relied on the presence of standard 802.11 fields in the frame headers, including MAC address, signal strength, data rate, and time stamp of a given Wi-Fi access point. Those were the only data necessary for my project and I did not use or review any other data collected by the Street View vehicles. I only became aware that payload data had been collected when various news outlets reported in May 2010 that the Street View vehicles were collecting Wi-Fi communications sent over open networks.

I declare under penalty of perjury that the foregoing is true and correct. Executed on August 31, 2011.

[REDACTED]

**DECLARATION OF** [REDACTED]

I, [REDACTED], hereby submit this declaration in connection with Google Inc.'s ("Google") responses to the Federal Communications Commission's requests for information in File No. EB-10-IH-4055. I declare as follows:

1. [REDACTED]  
[REDACTED] [REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

2. I understood that the purpose of the Wi-Fi equipment was to identify Wi-Fi access points as cars drove along for use in location-based services. The Street View team was not responsible for the functionality of the Wi-Fi equipment.

3. I was not aware that the Wi-Fi equipment onboard Street View vehicles could receive payload data or that the equipment had been programmed to collect payload data from open Wi-Fi networks. I only learned in May 2010 that payload data from open Wi-Fi networks had been collected by Street View vehicles. As a result, it was my job to implement the Company's direction to discontinue driving Street View cars around the world and to ensure the Wi-Fi collection equipment was removed from the vehicles before driving recommenced.

I declare under penalty of perjury that the foregoing is true and correct. Executed on August 30, 2011.

[REDACTED]

**DECLARATION OF** [REDACTED]

I, [REDACTED] hereby submit this declaration in connection with Google Inc.'s ("Google") responses to the Federal Communications Commission's requests for information in File No. EB-10-IH-4055. I declare as follows:

1. [REDACTED]  
[REDACTED]

2. When Wi-Fi equipment was added to Street View vehicles, [REDACTED] the technical details that allowed the logging equipment designed by [REDACTED] to read the GPS data that Street View vehicles were already logging.

3. [REDACTED] to ensure hardware and software interoperability with the Street View vehicles' existing hardware and software, which was used to capture images and access GPS data. Testing revealed that the amount of Wi-Fi data being collected was miniscule relative to the size of the images and GPS data that the Street View cars already were collecting, and would not pose any technical problems. I did work with [REDACTED] to resolve a minor bug that was causing the program to shutdown at one point. But that bug was unrelated to any payload collection and in the course of resolving the bug I never learned that any payload was being collected.

4. I recall receiving the design document prepared by [REDACTED], but I do not recall any reference to payload collection. I was not aware at that time that the Wi-Fi equipment onboard Street View vehicles could receive payload data. I only became aware that payload data



had in fact been collected when various news outlets reported in May 2010 that the Street View vehicles were collecting Wi-Fi communications sent over unencrypted networks.

I declare under penalty of perjury that the foregoing is true and correct. Executed on August 31, 2011.



**DECLARATION OF** [REDACTED]

I, [REDACTED] hereby submit this declaration in connection with Google Inc.'s ("Google") responses to the Federal Communications Commission's requests for information in File No. EB-10-IH-4055. I declare as follows:

1. [REDACTED]  
[REDACTED]

2. Google allows its engineers to dedicate up to 20 percent of their time to work on projects of interest to them that are not within the normal scope of their job. This is known as the "20% Program."

3. As part of the 20% Program, a Google engineer named [REDACTED] undertook in mid-2007 to outfit Google's Street View vehicles with devices that would allow them to identify Wi-Fi access points the cars drove past. This data could then be used in future location-based services.

4. Although Wi-Fi collection had nothing to do with the Street View project, Street View vehicles were an ideal platform for this collection. [REDACTED] drafted a design document (essentially a project summary and proposal) for the Wi-Fi project and wrote the necessary code to store data publicly broadcast from access points. I have no recollection of reading the design document.

5. I did not request that [REDACTED] program the Street View equipment to collect payload data, nor did I think about the collection of that data as possibility because the purpose was to correlate public access point information with GPS signals to assist in determining location. I only became aware that payload data had in fact been collected when various news outlets reported that the Street View vehicles were collecting Wi-Fi communications sent over unencrypted networks, and I frankly thought the reports were wrong.

6. To my knowledge the payload data collected by the Street View vehicles has never been included in any product or service, and no product manager requested that the payload be collected for any product or service. [REDACTED] I would expect that if anyone had wanted to use payload in a product or service, they would have necessarily asked me. No one ever did.

I declare under penalty of perjury that the foregoing is true and correct. Executed on August 30, 2011.

[REDACTED]