EXHIBIT B

BINGHAM

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Re: *Skyhook Wireless, Inc. v. Google Inc.*
        Case No. 10-cv-11571-RWZ (D. Mass.)

Dear Sam:

I enclose Google's Preliminary Identification of Claim Terms Subject to Claim Construction. Google reserves the right to add or remove terms from this list as warranted, particularly given that Skyhook has not yet disclosed its contentions as to the scope of the claims.

As you are aware, Google contends that numerous limitations of the patents-in-suit do not "particularly point[] out and distinctly claim[] the subject matter which the applicant regards as his invention" as required by 35 U.S.C. § 112, ¶ 1. *See* Google Inc.'s Preliminary Invalidity Contentions at 22-24. We have included those claim terms on the enclosed list of terms, even though Google believes that these claim limitations are insolubly ambiguous, and not properly susceptible to construction. If Skyhook contends that these limitations meet the definiteness requirement, it should propose appropriate constructions.

Sincerely,

Susan Baker Manning

Enclosure

A/74451145.1

Skyhook Wireless Inc. v. Google Inc.
Case No. 10-cv-11571-RWZ (D. Mass.)

Google's Preliminary Identification of Claim Terms
Subject to Claim Construction

July 25, 2011

Term No.	Claim language	Appears in asserted claims
1.	"Wi-Fi location server"	'988/1 (preamble)
2.	"a database of Wi-Fi access points for at least one target area"	'988/1 '694/1
3.	"Wi-Fi access points"	'988/1, 3 '694/1 '245/1, 2 '897/1, 3, 4
4.	"target area"	'988/1 '694/1, 2 '245/1
5.	"radius"	'988/1 '694/1
6.	"a radius on the order of tens of miles"	'988/1 '694/1
7.	"database records"	'988/1 '694/1
8.	"substantially all Wi-Fi access points"	'988/1 '694/1
9.	"identification information for a corresponding Wi-Fi access point"	'988/1 '694/1
10.	"calculated position information"	'988/1 '694/1
11.	"reference symmetry"	'988/1 '694/1
12.	"arterial bias"	'988/1 '694/1

Term No.	Claim language	Appears in asserted claims
13.	"recording multiple readings of the Wi-Fi access point at different locations around the Wi-Fi access point so that the multiple readings have reference symmetry relative to other Wi-Fi access points in the target area and so that the calculation of the position of the Wi-Fi access point avoids arterial bias in the calculated position information"	'988/1
14.	"logic to recalculate position information for Wi-Fi access points previously stored in the database to utilize position information for the newly-discovered readings of previously stored Wi-Fi access points"	'988/1
15.	"computer-implemented logic to add records to the database for newly-discovered Wi-Fi access points"	'988/1
16.	"computer-implemented clustering logic to identify position information based on error prone GPS information"	'988/2
17.	"logic to determine a weighted centroid position for all position information reported for an access point"	'988/3
18.	"logic to identify position information that exceeds a statistically-based deviation threshold amount away from the centroid position"	'988/3
19.	"calculated positions of the Wi-Fi access points"	'988/3
20.	"the clustering logic … excludes such deviating position information from the database and from influencing the calculated positions of the Wi-Fi access points"	'988/3
21.	"recording multiple readings of the Wi-Fi access point at different locations around the Wi-Fi access point so that the multiple readings avoid arterial bias in the calculated position information of the Wi-Fi access point"	'694/1
22.	"wherein the database records for substantially all Wi-Fi access points in the target area provide reference symmetry within the target area"	'694/1
23.	"provide reference symmetry"	'694/1
24.	"a user-device having a Wi-Fi radio"	'245/1
25.	"providing a reference database of calculated locations of Wi-Fi access points in a target area"	'245/1
26.	"calculated locations"	'245/1, 2
27.	"in response to a user application request to determine a location of a user-device having a Wi-Fi radio"	'245/1

Term No.	Claim language	Appears in asserted claims
28.	"triggering the Wi-Fi device to transmit a request to all Wi-Fi access points within range of the Wi-Fi device"	'245/1
29.	"receiving messages from the Wi-Fi access points within range of the Wi-Fi device, each message identifying the Wi-Fi access point sending the message"	'245/1
30.	"accessing the reference database to obtain the calculated locations for the identified Wi-Fi access points"	'245/1
31.	"location-determination algorithm"	'245/1, 6, 8
32.	"said chosen algorithm being suited for the number of identified Wi-Fi access points"	'245/1
33.	"using the calculated locations for the identified Wi-Fi access points and the signal strengths of said received messages and the chosen location-determination algorithm to determine the location of the user-device"	'245/1
34.	"simple signal strength weighted average model"	'245/6
35.	"triangulation technique"	'245/8
36.	"a WiFi-enabled device"	'897/1
37.	"a WiFi-enabled device communicating with WiFi access points within range of the WiFi-enabled device so that observed WiFi access points identify themselves"	'897/1
38.	"accessing a reference database to obtain information specifying a recorded location for each observed WiFi access point"	'897/1
39.	"using the recorded location information for each of the observed WiFi access points in conjunction with predefined rules to determine whether an observed WiFi access point should be included or excluded from a set of WiFi access points"	'897/1
40.	"recorded location information"	'897/1, 3
41.	"geographical position"	'897/1, 2
42.	"using the recorded location information of only the WiFi access points included in the set and omitting the recorded location information of the excluded WiFi access points to calculate the geographical position of the WiFi-enabled device"	'897/1
43.	"using the signal strength information when calculating the geographical position of the WiFi-enabled device"	'897/2

Term No.	Claim language	Appears in asserted claims
44.	"rules to determine a reference point and to compare the recorded location information for each of the observed WiFi access points to the reference point"	'897/3
45.	"WiFi access points having a recorded location within a predefined threshold distance of the reference point"	'897/3
46.	"WiFi access points having a recorded location in excess of the predefined threshold distance of the reference point"	'897/3

CERTIFICATE OF SERVICE

I hereby certify that on July 25, 2011, I served the forgoing **Google's Preliminary Identification of Claim Terms Subject to Claim Construction** via email to the following:

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