

Before the  
**FEDERAL COMMUNICATIONS COMMISSION**  
Washington, DC 20554

|   |   |                      |
|---|---|----------------------|
| In the Matter of                            | ) |                      |
|   | ) |                      |
| Unlicensed Use of the 6 GHz Band            | ) | ET Docket No. 18-295 |
|   | ) |                      |
| Expanding Flexible Use in Mid-Band Spectrum | ) | GN Docket No. 17-183 |
| Between 3.7 and 24 GHz                      | ) |                      |

**REPLY COMMENTS OF THE BMW  
GROUP**

As part of the BMW Group’s commitment to road safety in the U.S., we have been expanding our available connected car services, including safety services, using cellular communication since 2013. Already, millions of BMW vehicles around the world are capable of receiving road and weather hazard warnings.

The BMW Group’s connected car approach is based on cellular technology. Accordingly, we strongly support the use of the 5.9 GHz band for Cellular Vehicle-to-Everything (“C-V2X”) services. Along these lines, the BMW Group recently filed comments in support of the waiver request submitted by the 5G Automotive Association (“5GAA”) to allow for C-V2X operations in the upper 20 megahertz of the 5.9 GHz band.<sup>1</sup>

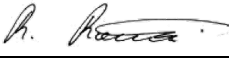
The proposed out-of-band-emission limit for unlicensed operations in the 6 GHz band would likely cause harmful interference to safety-related C-V2X services. Given the potential of C-V2X services to dramatically improve safety on America’s roads, this seems like an unnecessary potential risk to safety-relevant communication. As a result, the BMW Group strongly supports the position of 5GAA, which would ensure protections for C-V2X and other

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<sup>1</sup> See Comments of BMW of North America, LLC, GN Docket 18-357, (filed Jan. 18, 2019).

vehicular safety operations in the 5.9 GHz band.<sup>2</sup>

Respectfully submitted,

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March 15, 2019

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<sup>2</sup> See Comments of 5G Automotive Association, ET Docket No. 18-295, GN Docket No. 17-183, at 5-6 (filed Feb. 15, 2019) (requiring indoor-only use for all operations using a channel with a center frequency below 5925 MHz +  $BW \cdot 3/2$ , where BW equals the bandwidth of the channel).