Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of Request by Google LLC for Waiver of Section 15.255(c)(3) of the Commission's Rules	ET Docket No. 18-70

Comments of Continental Automotive Systems, Inc.

Continental Automotive Systems, Inc. ("Continental) hereby submits these comments in support of the Request for Waiver (the "Waiver Request") filed by Google, LLC ("Google").[1] For the reasons set forth in the Waiver Request and in these comments, the Commission should grant the waiver.

Discussion

Continental is a leading supplier of numerous automotive goods and services, including automotive parts and crash avoidance technologies. Continental operates in approximately 50 countries, and as a result it recognizes the critical importance of the U.S. harmonizing its regulatory standards with those of other countries wherever practicable. For three reasons, Continental supports the Waiver Request in this proceeding.

First, Google requests that the Commission allow Google to operate its short-range interactive motion sensors in a manner that would still comply with the limits set forth by the European Telecommunications Standards Institute ("ETSI"). The Commission has previously

[1] Public Notice, *Office and Engineering and Technology Seeks Comment on Google's Request for Waiver of Section 15.255(c)(3) of the Commission's Rules for Radars Used for Interactive Motion Sensing in the 57-64 GHz Band,* ET Docket No. 18-70 (Rel. March 12, 2018).

found that it is important where practicable to harmonize its rules with standards in other countries, including those in the EU.[2] This approach makes perfect sense. Unless there is a reason to distinguish between the U.S. and Europe in light of the relevant circumstances involved, if a device complies with ETSI standards the risk of interference from applying the same limits in the U.S. is minimal. After all, like the Commission's standards, the ETSI standards are intended to minimize the likelihood of harmful interference occurring among devices. Moreover, it is contrary to the public interest to require companies to build, test, and maintain separate devices for the U.S. and Europe because of varying regulatory standards that, for no justifiable reason, have not been harmonized. Such inconsistent requirements simply increase companies' costs that will ordinarily be passed down to consumers with no corresponding benefit.

Second, with respect to the device at issue in this proceeding, the high path loss in the frequency range of 57-64 GHz makes it unlikely that the device will cause interference with other short-range devices and services. This high path loss is due to the fact that *"[n]ear 60 GHz, many oxygen absorption lines merge together, at sea-level pressures, to form a single, broad absorption band...."*[3]

Finally, the International Telecommunications Union recommendation in ITU-R M.1452-2 (05/2012),[4] by analogy, supports Google's position. In Annex 3 of that document, the ITU recommends a transmitter power of +10dBm (10mW) with a +17dBi antenna gain, resulting in

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[2] Waiver Request, n. 15; See also *In the Matter of Amendment of Parts 1, 2, 15, 90, and 95 of the Commission's Rules to Permit Radar Services in the 76-81 GHz Band,* Report and Order, FCC-17-94, ET Docket No. 15-26, at ¶29.

[3] Recommendation ITU-R P.676-3, Attenuation by Atmospheric Gases (Question ITU-R 201/3), (1990-1992-1995-1997), Annex 1 at p.1. Figure 2 therein includes a plot of the specific attenuation ("path loss") in the range 50-70 GHz. Id. at p. 3.

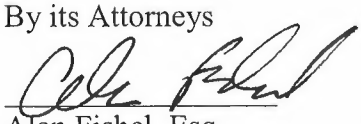
[4] Recommendation ITU-R M.1452-2 (05/2012) Millimetre wave vehicular collision avoidance radars and radiocommunication systems for intelligent transport system applications.

an EIRP level of 27dBm. The ITU is recommending these power limits for "millimetre wave radiocommunication systems for data communications between vehicles and between vehicles and roadside infrastructure."[5] Continental, however, believes that similar values would also be appropriate for interactive motion sensors, as there is little risk of interactive motion sensors interfering with millimetre wave radiocommunication systems for data communications between vehicles and between vehicles and roadside infrastructure in the 57-64 GHz range, particularly given the high path loss at 57-64 GHz (as mentioned above).

Respectfully submitted,

Continental Automotive Systems, Inc.

By its Attorneys



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[5] Id. at 7; See also Id. at 2.