



July 7, 2016

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, D.C. 20554

Re: ET Docket No. 13-49, Comments of Continental to Refresh the Record on Unlicensed National Information Infrastructure (U-NII) Devices in the 5 GHz Band

Secretary Dortch,

Continental¹ appreciates the opportunity to respond to the Federal Communications Commission's (FCC) Public Notice dated June 1, 2016 (FCC 16-68) to update and refresh the record on the use of U-NII devices in and near the 5.9 GHz band designated for Dedicated Short Range Communications (DSRC). Continental urges the Commission to preserve the 5.9 GHz band allocated for the Department of Transportation and its channelization as designed for DSRC safety-of-life benefits and mobility applications. Any spectrum sharing protocol must work around currently deployed and planned deployments of DSRC applications along with comprehensive testing to determine the protocol is safe before any sharing implementation.

Continental AG was founded in 1871 as a manufacturer of soft rubber products, rubberized fabrics and tires for carriages and bicycles. Today it ranks among the largest automotive suppliers worldwide with production in brake systems, powertrains, chassis, instrumentation, infotainment solutions, vehicle electronics, tires, technical elastomers and serves as a global partner in networked automobile communication. A collaboration of more than 200,000 employees in 300 locations around the world strives to create, innovate and develop new technologies to enhance vehicular safety. As an established partner in the development of Intelligent Transportation Systems, we strongly oppose any proposal for re-channelization of the 5.9 GHz band that would further delay deployment of available lifesaving technology and nullify years of public-private research, development and investment.

¹ Continental develops intelligent technologies for transporting people and their goods. As a reliable global partner, the international automotive supplier, tire manufacturer, and industrial partner provides sustainable, safe, comfortable, individual, and affordable solutions.

In responding to your request for comment to update and refresh the record on the use of U-NII devices in and near the 5.9 GHz band designated for DSRC, Continental organized its knowledgeable experts from within our various business units to provide input to multiple trade associations and standards setting organizations (Domestic and Worldwide). Specifically, Continental actively participated and contributed to the development of comments that are being filed by the Motor Equipment Manufacturers Association (MEMA) and the Car 2 Car Communication Consortium (C2C-CC).

For technical input, please refer to the comments filed by MEMA and C2C-CC.

Continental would like to thank the Secretary and the Commission for the opportunity to provide input on the agency's request for comment. Should you have questions regarding any of the information discussed in the response, please do not hesitate to contact me at (202) 657-2951.

Sincerely,

A handwritten signature in black ink, appearing to read 'I. Musselman', written in a cursive style.

Ian P. Musselman
Director, Government Affairs