

July 30, 2016

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Room TW-A325
Washington, D.C. 20554

Re: ET Docket No. 15-26, Amendments of Parts 1, 2, 15, 90, and 95 of the Commission's Rules to Permit Radar Services in the 76-81 GHz Band
ET Docket No. 11-90, Amendment of Sections 15.35 and 15.253 of the Commission's Rules Regarding Operation of Radar Systems in the 76-77 GHz Band
ET Docket No. 10-28, Amendment of Section 15.253 of the Commission's Rules to Permit Fixed Use of Radar in the 76-77 GHz Band
WT Docket No. 11-202, Amendment of the Commission's Rules to Permit Radiolocation Operations in the 78-81 GHz Band

Dear Ms. Dortch:

Continental Automotive ("Continental")¹ submits this letter to the subject-referenced dockets regarding vehicular radar applications in the 76-81 and 24 GHz bands.

Continental supports allowing vehicular radars to operate under Part 95 (License-By-Rule) in the 76-81 GHz band. Permitting vehicular radar in the 76-81 GHz band will enable suppliers like Continental to further develop and deploy short-range radar (SRR) for safety applications such as autonomous braking, collision warning, lane departure warning and blind spot detection. We caution the FCC to not allow any new fixed radar application in the 76-81 GHz band as fixed infrastructure radars create safety concerns due to harmful interference.

Regarding vehicular radar operating in the 24 GHz band, we request that the Commission not prematurely phase out the authorization of new 24 GHz wideband and ultra-wideband ("UWB") vehicular radar equipment as doing so would likely hinder further innovation of new vehicular radar systems and related safety applications. We support the Ex Parte comment filed on July 15, 2016 by Hogan Lovells on behalf of Mercedes-Benz USA LLC² and agree with the Alliance of Automobile Manufacturers and the Association of Global Automakers who recommend that the Commission allow in perpetuity the manufacture, marketing, sale, installation and operation of 24 GHz wideband and UWB vehicular radar equipment that is consistent with existing FCC equipment authorizations. As noted in their filing dated July 22, 2016³, vehicular radar manufacturers have made considerable investments and advancements in their existing 24 GHz wideband and UWB vehicular radar systems and many of the safety features available in the market today rely on these systems. Furthermore, not phasing out the authorization of new 24 GHz wideband and UWB vehicle radar will help ensure the existence of a robust market for replacement parts for vehicular radar systems in

¹ Continental is one of the world's leading automotive suppliers. Continental contributes to enhanced driving safety and global climate protection with innovative brake systems, systems and components for powertrains and chassis, instrumentation, infotainment solutions, vehicle electronics, tires and technical elastomers. Continental's goal is to make individual mobility safer, more environmentally friendly, more networked, and affordable worldwide.

² Comments filed by Ari. Q. Fitzgerald (Hogan Lovells) on behalf of Mercedes-Benz USA LLC, July 15, 2016, FCC Filing ID # 1071595172677.

³ Comments filed by Ari. Q. Fitzgerald (Hogan Lovells) on behalf of the Alliance of Automobiles Manufacturers and the Association of Global Automakers, July 22, 2016, FCC Filing ID # 1072217985911.

operation today. Continental requests the FCC confirm that the 24.00-24.25 GHz band (ISM band) will continue to be available for automotive sensors regulated under FCC part 15.249.

Thank you for your time and consideration of these comments. Should you have any questions, I can be reached by telephone at (202) 567-2951 or via email at ian.musselman@continental-corporation.com.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Ian Musselman', with a long horizontal flourish extending to the right.

Ian Musselman
Director, Government Affairs