

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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)	ET Docket No. 15-26
)	
Amendment of Part 15 of the Commission's Rules to Permit the Operation of Vehicular Radar Services in the 77-78 GHz Band)	RM-11666
)	
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. 11-90
)	RM-11555
)	
Amendment of Section 15.253 of the Commission's Rules to Permit Fixed Use of Radar in the 76-77 GHz Band)	ET Docket No. 10-28
)	

Navtech Radar Ltd ex parte letter on Proceeding Number 15-26, FCC15-16 Notice of Proposed Rulemaking (NPRM) and Reconsideration Order for the band of 76-81 GHz Band.

Navtech Radar Ltd submits this ex parte letter in response to specific reply comments submitted by Robert Bosch LLC with respect to the publication of FCC 15-16.

1. Navtech Radar feel compelled to address a specific aspect of the Robert Bosch LLC ("Bosch") reply comments. In this reply comment submission, the following text is presented to the FCC in paragraph 11:

"As Bosch argued in its comments, Navtech's interest in 76-77 GHz in particular is due to the fact that it already has on hand products for that band which are, for a limited time, authorized in Europe. In Europe, however, fixed radar installations at 76-77 GHz are being phased out."

This statement suggests that fixed radar applications will be phased out in Europe. To the best of Navtech Radar's knowledge and having re-consulted with a member of the ETSI committee, Navtech Radar believe this is **absolutely not** the case. Therefore we feel strongly that this is a misleading statement and it raises a major concern that the FCC may base part of their final ruling decision on this.

2. Navtech Radar have referenced the European decision in its reply comments, (2013/752/EU), which is not time limited. Within the last month ETSI have adopted a work item to write a harmonised standard for fixed radars in this band. Navtech Radar would therefore strongly urge the FCC to contact the European Commission or CEPT for clarification, if the FCC is in any doubt as to situation with the European regulations, regarding the shared use of the 76-77GHz band.

3. Navtech Radar have written this letter as this misleading point was not visible until after the deadline for reply comment was closed and therefore were unable to respond accordingly within the standard timeframe for replies.

This ex parte letter is respectfully submitted this day 22nd April 2015.

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