

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

In the Matter of )  
 )  
 )  
Amendment of Section 15.253 of the ) Report No. 2896  
Commission's Rules Regarding ) RM-11555  
Operation within the Band 76.0-77.0 )  
GHz ( vehicle radar systems )

To The Commission

Comments on Notice of the Petition for Rulemaking

Fujitsu Ten, a manufacturer of vehicle radar systems has the following Comments on the Notice of Petition for Rulemaking issued by the Federal Communication Commission:

- Fujitsu Ten supports the Petition RM-11555 by Toyota Motor North America, INC.

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## 1. Background

From 2003, Fujitsu ten has started to manufacture of vehicle radar systems for the ACC (Adaptive Cruise Control) application.

Recently, many vehicle manufacturers have been developed effective safety system, such as CMBS (collision mitigation Brake System) and RPCS (Rear Pre-Collision System).

And these systems require higher specifications to the Radar functions, year by year to reduce fatalities of traffic accident.

## 2. Discussion

### 2.1 Section 15.253(b)

State of the art at application of automotive safety system is Collision Mitigation System including FSRA (Full Speed Range ACC) , LSF(Low speed following).

For rear safety system, advanced RPCS (Rear Pre-Collision System) should act at vehicle waiting status to turn to left on the lane, as not in motion.

To realize such system, it is necessary to eliminate “ not in motion” criteria in Section 15.253(b).

### 2.2 Section 15.253(b)(2) and (b)(3)

In the Petition by Toyota, they provide major standards in table 1 at page 9.

From the point of view in international harmonization, peak power density limits should be a uniform specification.

If the Radar specification will be uniform, radar manufacturer will be able to reduce cost so that popularization of automotive safety system will reduce fatalities of traffic accident .

## 3. Conclusion

For the above reason, Fujitsu Ten support the Petition RM-11555 by Toyota Motor North America, INC.

Respectfully submitted

By :  September 22nd, 2009

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