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November 2, 2011

VIA ELECTRONIC FILING

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW
Room TW-B204
Washington, DC 20554

Re: ET Docket No. 11-90; RM-11555; ET Docket No. 10-28; EX PARTE

Dear Ms. Dortch:

This is to inform you that on Monday, October 31, 2011, the undersigned on behalf of Toyota Motor North America, Inc. and Toyota Motor Corporation (collectively, "Toyota"); Mr. Kevin Ro and Ms. Megumi Suzuki of Toyota; Mr. Will Otero on behalf of the Alliance of Automobile Manufacturers; Mssrs. Michael Cammisa and Roger Fairchild on behalf of the Association of Global Automakers; Mr. Christopher Imlay on behalf of Robert Bosch, GmbH; Ms. Nancy Bell of Chrysler Corporation; Mr. Ari Fitzgerald of Hogan Lovells on behalf of Mercedes-Benz USA and the Strategic Automotive Radar Frequency Allocation Group; and Mr. Paul Standtke of TRW (collectively, the "Automobile Industry Representatives") met with Ms. Angela Giancarlo, Chief of Staff and Senior Legal Advisor for Commissioner Robert McDowell. The Automobile Industry Representatives later that day met with Ms. Amy Levine, Senior Counsel and Legal Advisor to Chairman Julius Genachowski.

In these meetings, Toyota and the other Automobile Industry Representatives urged the Commission to act expeditiously to amend Sections 15.35 and 15.253 of the Commission's Rules to establish limits for radiated emissions that are based solely on preventing unwanted electromagnetic interference, as set forth in their respective filings. Toyota and the other Automobile Industry Representatives reiterated that the "in-motion" and "not-in-motion" distinctions currently set forth in the emissions limits for vehicular radar systems are outdated and no longer appropriate given the advent of sideward-, rearward- and forward-looking radar systems, and that a single emission limit should apply in all directions. They also cited the cost savings and consumer benefits that will flow from international harmonization (the proposed rules are similar to rules currently applicable in Europe), as the 76-77 GHz band has emerged as the global standard band for long-range automotive radar.

Toyota and the other Automobile Industry Representatives also strongly cautioned the Commission not to authorize the proliferation of unlimited unlicensed fixed radar systems at 76-

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77 GHz without further study. They noted that (i) no study has concluded that there is compatibility between vehicular radars and unspecified fixed radar uses in the 76-77 GHz band, (ii) in fact, the evidence that does exist to date suggests that such uses would cause harmful interference to vehicular radar operations, and could jeopardize collision avoidance and driver safety; (iii) in permitting unlimited, unlicensed fixed radar applications with no technical or evidentiary basis, the Commission would be reaching well beyond the ERA proposal, which had numerous built-in safeguards, and which was focused only on fixed airport radars using professional installations at FAA-recognized airports on a licensed basis, among other safeguards; (iv) no third party has advocated that the Commission authorize unlimited, unlicensed fixed radar applications at 76-77 GHz; and (v) in contrast to vehicle-to-vehicle compatibility, which is well-understood as the result of past and ongoing rigorous studies, real-world experience and established mitigation techniques, it is not clear that unlicensed fixed radar manufacturers or users would have the same incentives to coordinate with automobile manufacturers to mitigate interference.

Based on these and other factors, the Automobile Industry Representatives urged the Commission to bifurcate the instant proceeding, and to implement quickly the modifications they seek in Sections 15.35 and 15.253. If the Commission desires to continue exploring whether a broader set of 76-77 GHz fixed radar applications than the application proposed by ERA are compatible with vehicular radar, the Automobile Industry Representatives suggested that the Commission could issue a Further Notice of Inquiry or Proposed Rulemaking in order to develop a record on the fixed radar issue.

Please contact the undersigned should you have any questions.

Very truly yours,

- /s/ -

James H. Barker

Counsel for Toyota Motor North America, Inc., and
Toyota Motor Corporation