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February 17, 2012

Via ECFS Electronic Filing Only

Marlene H. Dortch, Secretary  
Federal Communications Commission  
Office of the Secretary  
445-12<sup>th</sup> Street, S.W.  
Washington, D.C. 20554

**Re: Notice of Oral Ex Parte Presentation, WT Docket No. 11-202; ET Dockets 11-90 And 10-23; Operation of Automotive Radar Systems in the 77-81 GHz Band; Mobile Use of that Band for Foreign Object Debris Radars.**

Greetings.

On Thursday, February 16, 2012, the undersigned, representing Robert Bosch, GmbH (Bosch), together with Dr. Michael Mahler of Bosch, met with staff members of the Wireless Telecommunications Bureau and the Office of Engineering and Technology. The principal topic of discussion at that meeting was the above-referenced WT Docket 11-202 proceeding concerning the amendment of Part 90 of the Commission's rules to permit Foreign Object Debris Radars in the band 78-81 GHz. Bosch is interested in the potential future operation of automotive short-range radar facilities. Bosch discussed the compatibility between and among FOD radars, automotive short-range radars, radioastronomy and the Amateur Radio Service in the 77-81 GHz band.

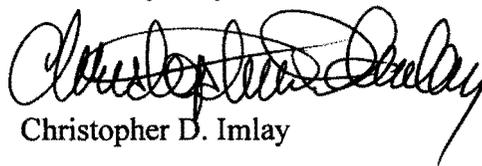
Attending on behalf of the Commission's Wireless Telecommunications Bureau were Mr. Tim Maguire and Mr. Scot Stone. Attending on behalf of the Office of Engineering and Technology were Mr. Ira Keltz; Mr. Mark Settle; Ms. Karen Ansari; Mr. Aamer Zain; and Mr. Alan Stillwell.

The discussion is summarized in comments filed by Bosch in the WT Docket 11-202 proceeding on or about February 8, 2012, and as set forth in the attached memorandum, copies of which were delivered to the Commission's staff members at the meeting.

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Questions concerning the foregoing ex parte statement or the attachment hereto should be addressed to the undersigned, counsel for Robert Bosch, GmbH.

Yours very truly,

A handwritten signature in black ink, appearing to read "Christopher D. Imlay", written in a cursive style.

Christopher D. Imlay

Attachment

**WT Docket No. 11-202**  
**Robert Bosch, GmbH Comments**  
**Radiolocation Operations in the 77-81 GHz Band**

- ▶ Bosch has no objection to the proposed amendment of the Commission's Part 90 rules to permit 78-81 GHz Foreign Object Debris (FOD) radars at airports on a licensed basis.
- ▶ However, the Commission should take no action in this proceeding which would hinder or preclude the rollout of short-range automotive radars (SRR) in the 77-81 GHz band in the United States.
- ▶ *Unlicensed* operation of FOD radars at airports should not be permitted. Only by individual licensing can siting requirements be effectively administered, such that FOD radars can be precluded from illuminating public roadways. Part 15 rules do not typically address siting issues or restrictions on installation configurations.
- ▶ The Commission should not resolve this docket proceeding without the benefit of technical showings, cooperatively prepared by the stakeholders, to maximize electromagnetic compatibility among mobile FOD radar systems at airports, automotive SRR radars at 77-81 GHz, Radioastronomy (RAS), and the Amateur Service.
- ▶ There is presently a worldwide plan to consolidate automotive radars in the 76-81 GHz band. CEPT has concluded that the so-called "79 GHz" band should be the only globally harmonized frequency band for automotive radars. WRC-12 has adopted the necessary recommendation for a WRC-15 radiolocation allocation at 75.5-78 GHz so that the entire band 76-81 GHz is now available for automotive radars.
- ▶ Bosch intends to submit in the near term a Petition for Rule Making proposing the modification of Section 15.253 of the Commission's rules to permit the operation of automotive short-range radars in the 77-81 GHz band in addition to the present 76-77 GHz band now available for that use by that same rule Section.
- ▶ FOD radars can be licensed in such a way as to minimize the potential for interaction between FOD radars and Part 15 automotive radars at 78-81 GHz. Motor vehicle operators and passengers must be entitled to rely on the effective performance of these systems without geographic limitations. Prudent siting of FOD radars must be insured through the licensing process. Flexible operating configuration regulation of FOD radars, coupled with the limited propagation characteristics of the 77-81 GHz band, can provide sufficient protection for short-range automotive radar operation without inhibiting FOD radar installation or operation.
- ▶ Mobile and ubiquitous FOD radars, automotive radars and Amateur Radio stations in this band, and millimeter-wave Radioastronomy interference issues require consideration. EMC issues can and should be resolved in the private sector cooperatively.