

BMW Group

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of

Amendment of Sections 15 of the
Commission's Rules to Permit the
Operation of Vehicular Radar Systems in
the 77 - 81 GHz Band.

)
)
) DA No. 12-1139
) RM-11666
)
)
)

COMMENTS OF THE BMW GROUP

On behalf of The BMW Group, BMW of North America, LLC (BMW) appreciates the opportunity to submit comments in response to the Notice of Proposed Rule Making (NPRM) issued by the Commission for the above-captioned proceeding.

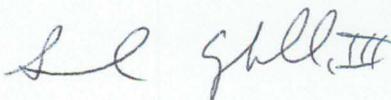
For more than 10 years, BMW has offered Advanced Cruise Control (ACC) systems in its vehicles utilizing 76 GHz radar systems in several countries (including the US). 76 GHz in our ACC system is also used for collision mitigation and other crash avoidance systems. Beginning in 2007, these systems were supported by 24 GHz UWB-radar. However, the licensing of those bands ends in most countries in 2013. In addition, certain number of countries permitted 77 - 81 GHz for future use of UWB radars

BMW supports using a 79 GHz radar system because it offers high local resolution for better data quality of detected object, and controllable technology (similar to 76-77 GHz band). Smaller equipment housing configuration can be used for easier vehicle integration and manufacturing, in addition to a cost range that allows for this system to be equipped in all varieties of passenger vehicles.

In Europe, RA-Stations are much closer in proximity to public roads than in the US. No reports or complaints have been received regarding any interference with BMW use of 76 GHz in its ACC system. Because the emitted power of 77 - 81 GHz radar system is less than the emitted power of 76 GHz radar system, BMW has no concerns of possible interference between the proposed band and RA-stations.

Therefore, BMW supports the change to Section 15 of the Commission's rules to permit the operation of vehicular radar systems to operate at 77 - 81 GHz on a non-allocated basis. If you or members of your staff have any questions, please contact Máximo Avilés at 201-571-5041 or at Máximo.Aviles@bmwna.com.

Sincerely,



Samuel Campbell, III
Department Head of Safety Engineering & ITS

Company
BMW of North America, LLC

Postal Address
PO Box 1227
Westwood, NJ
07675-1227

Office Address
200 Chestnut Ridge Road
Bldg. 150
Woodcliff Lake, NJ
07677-7739

Telephone
201-571-5071

Fax
201-571-5479

eMail
Tom.Baloga@bmwna.com

