

August 16, 2012

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Attention: Office of Engineering and Technology

**Re: Robert Bosch April 27, 2012, Petition for Rulemaking
To Amend Part 15 Regulations to Permit the
Operation of Vehicular Radar Systems in the
77-81 GHz Band
(RM- 11666)**

Dear Ms. Dortch:

The Technical Affairs Committee of the Association of Global Automakers (“Global Automakers”)¹ supports the April 27, 2012, petition for rulemaking filed on behalf of Robert Bosch LLC (“Bosch”) and the 79 GHz Project to amend section 15.253 of FCC regulations (referred to herein as the “Bosch petition”). The proposed amendments would permit the operation of unlicensed, short range vehicular radar systems in the 77-81 GHz band.

As noted in the Bosch petition –

- The 79 GHz frequency range is the most suitable band for short range automotive radar applications on a worldwide basis.
- There is a shortage of available spectrum for vehicular radars in the United States.
- Sharing of the 76-77 GHz band, which is currently designated for vehicular and infrastructure radar systems in the U.S. pursuant to section 15.233 of the FCC rules, is not feasible for both high-resolution, short range applications and long range radars for use in such technologies as adaptive cruise control.
- Sharing of the 77-81 GHz band with current users (such as amateur radio and radio astronomy systems) is feasible without significant impact upon these existing users.

¹ The Association of Global Automakers represents international motor vehicle manufacturers, original equipment suppliers, and other automotive-related trade associations. Our Technical Affairs Committee members include: American Honda Motor Co., American Suzuki Motor Corp., Aston Martin Lagonda of North America, Inc., Ferrari North America, Inc., Hyundai Motor America, Isuzu Motors America, Inc., Kia Motors America, Inc., Maserati North America, Inc., McLaren Automotive Ltd., Nissan North America, Inc. Peugeot Motors of America Subaru of America, Inc., ADVICS North America, Inc., Delphi Corporation, Denso International America, Inc., and Robert Bosch Corporation. We work with industry leaders, legislators, and regulators in the United States to create public policies that improve motor vehicle safety, encourage technological innovation, and protect our planet. Our goal is to foster an open and competitive automotive marketplace that encourages investment, job growth, and development of vehicles that can enhance Americans’ quality of life. For more information, visit www.globalautomakers.org.

- International harmonization of frequency allocations for short range vehicular radar applications would reduce manufacturing costs for such systems, facilitating more widespread use of these life-saving technologies.

Autonomous braking systems have recently begun appearing in the market. Preliminary data and analysis support projections of substantial safety benefits associated with these short range vehicular radar-based technologies.

- On July 3, the National Highway Traffic Safety Administration (“NHTSA”) published a notice inviting public comment on its research report regarding its 2-year study of advanced braking technologies. These technologies use short range radar to detect imminent crash situations and actuate automatic braking. The NHTSA report concludes that, if light vehicles were to employ a combination of forward collision warning, dynamic braking, and crash imminent braking systems, over 1,000 lives annually could be saved. The NHTSA notice may be viewed at 77 Fed. Reg. 39561. The NHTSA research report is available in Docket NHTSA-2012-0057-0001, at <http://www.regulations.gov/#!docketDetail;D=NHTSA-2012-0057;ct=FR%252BPR%252BN%252BO%252BSR>.
- Also on July 3, the Insurance Institute for Highway Safety (“IIHS”) announced the results of its study of forward collision avoidance systems. Insurance claim frequency was reduced by 14 percent for current vehicles that are equipped with autonomous braking systems. The results of the IIHS analysis may be viewed at <http://www.iihs.org/news/rss/pr070312.html>.

The potential importance of these new vehicular safety technologies justifies making reasonable accommodations for them in the FCC rules. We urge the Commission to move expeditiously to pursue the recommendations in the Bosch petition.

Global Automakers appreciates the Commission’s consideration of our comments. Should you have any questions on this matter, please contact me at 202-650-5561.

Sincerely,



Michael X. Cammisa
Director, Safety

cc: Julius P. Knapp, Chief Engineer, Office of Engineering and Technology