

BMW Group

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

In the Matter of)
)
) ET Docket No. 11-90
Amendment of Sections 15.35 and 15.253) RM-11555
of the Commission's Rules Regarding)
Operation of Radar Systems in the 76-77)
GHz Band.)

Amendment of Section 15.253 of the)
Commission's Rules to Permit Fixed Use of) ET Docket No. 10-28
Radar in the 76-77 GHz Band.)

**OPPOSITION OF THE BMW GROUP TO
PETITIONS FOR RECONSIDERATION**

On behalf of The BMW Group, BMW of North America, LLC (BMW) appreciates the opportunity to submit these comments in response to the Petition for Reconsideration submitted by NAVTECH. In addition to supporting the comments of the Alliance of Automobile Manufacturers and Bosch, the BMW Group is pleased to provide the following comments:

- We see a significant risk for our radar based safety systems in our vehicles.
- The MOSARIM (MOre Safety for All by Radar Interference Mitigation) Project (an European Union funded project formed by suppliers and vehicle manufacturers) evaluated the actual radar interference potential among vehicular radars, fixed radars, and off the shelf radar sensors, and noticed significant signals above noise level. This includes interference measurements with NAVTECH radars (TMS). This type of interference could potentially result in harmful events if the vehicle radar is blocked and the driver assistance system fails to avoid an accident.
- We would like to restate our strong concerns with allowing fixed radar installations. However, we can potentially agree to other services within the 77GHz band (e.g.: Helicopter ground detection, leveling of liquids, airfield supervision, etc.) as long as they do not interfere with vehicular radars.

If you or members of your staff have any questions, please contact me at 201-571-5360 or Máximo Avilés at 201-571-5041 or at Maximo.Aviles@bmwna.com.

Respectfully submitted on December 3rd, 2012.

Sincerely,



Samuel Campbell, III
Department Head 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
201-571-5360

Fax
201-571-5479

eMail
Sam.Campbell@bmwna.com

