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September 3, 2014

Via Courier and E-mail
Tom.Wheeler@fcc.gov

Honorable Tom Wheeler, Chairman
Federal Communications Commission
445-12th Street, S.W., 8th Floor
Washington, D.C. 20554

Re: Automotive Radars at 77-81 GHz; RM-11666.

Dear Chairman Wheeler:

The undersigned are representatives of the Bosch group of companies (Bosch) that manufacture and sell a variety of products for numerous industries, including automotive radar systems and other automotive products. Previously, Robert Bosch LLC ("Bosch") filed a Petition for Rule Making in May of 2012, which has not progressed since that date. We believe that the regulatory relief requested in the Petition could help to save many lives and prevent injuries by reducing the number and severity of automobile accidents. We therefore respectfully urge you to consider proceeding with the adjudication of this Petition.

RM-11666 proposes to modify Section 15.253 of the Commission's rules (47 C.F.R. §15.253) in order to permit the operation of unlicensed, high-resolution short-range vehicular radar systems in the band 77-81 GHz (in addition to the bands 46.7-46.9 GHz and 76.0-77.0 GHz, which are presently available for such operation pursuant to that Rule Section). The availability of the 77-81 GHz band is critical to improved automotive safety in the United States. It will enhance the deployment of advanced safety related functions such as collision warning and mitigation systems such as automatic emergency braking and object discrimination and separation in urban scenarios, blind spot monitoring, lane departure warning (LDW) and lane keeping support (LKS), and rear cross traffic alert. We believe that these new deployments for automotive radar systems will help to reduce the number of fatalities and personal injuries by preventing or mitigating vehicular collisions as well as crashes involving Vulnerable Road Users (such as bicyclists, motorcyclists and pedestrians).

At present, there are two frequency ranges accessible to automotive radar systems in the United States (at 24 GHz and 76-77 GHz). However, we are concerned that they will not be sufficient to accommodate the large-scale implementation of new safety related functions for automotive radars due to limited bandwidth and thus insufficient object discrimination. Now, the long range automotive radar systems in those two frequency ranges must be supplemented by a wider bandwidth segment for high – resolution, short-range radars. There are various reasons

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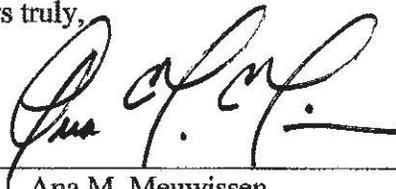
why these advanced radar deployments will necessitate broader bandwidth, but in general there is a need for better range separation, range accuracy, angular accuracy and good object discrimination. This requires an occupied bandwidth of up to 4 GHz. With systems operating in the current available frequency ranges, the demand for better object discrimination cannot be fulfilled.

Automotive radars in Japan and Europe are already utilizing the 77-81 GHz band. A wide spread frequency harmonization would help diminish certain hurdles and enable a higher rate of adoption and deployment of automotive high resolution radar systems.

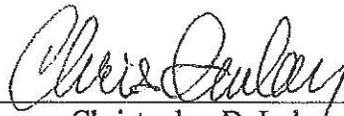
It is our understanding that there were no objections raised when the Commission placed the Bosch petition on Public Notice. In addition, representatives of Bosch have met repeatedly with representatives of the radio astronomy community and the Amateur Radio Service, neither of which has interposed any objection to the Petition, and we have worked directly with the FCC Office of Engineering and Technology on this topic.

Bosch respectfully requests that the Commission release a Notice of Proposed Rule Making, and proceed expeditiously to finalize the rule change proposed in RM-11666. Thank you for your leadership and for your consideration of this request.

Yours truly,



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