



November 27, 2001

The Honorable Michael Powell
Chairman
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, D.C. 20554

**Re: ET Docket 98-153: In the Matter of Revision of Part 15 of the FCC's Rules
Regarding Ultra-Wideband Transmission Systems**

Dear Chairman Powell:

We write you as members of the Short Range Automotive Radio Frequency Group ("SARA")^{1/} to indicate SARA's strong support for your stated intention to issue rules in the very near future that will enable the deployment of ultra-wideband ("UWB") technology. UWB is a wireless technology that has the potential to foster innovative, beneficial and spectrally efficient automotive radar applications at 24 GHz. The automotive radar applications envisioned by SARA's members require intentional emissions into a spectrum band no wider than +/- 2.5 GHz around a center frequency of 24.125 GHz. Accordingly, these applications will occupy spectrum that is far removed from Global Positioning System ("GPS") spectrum, and, therefore, will pose no threat to GPS services. We expect SARA's automotive radar applications to enhance significantly the safety of America's roadways. Moreover, as participants in this more than three year old proceeding, we are confident that SARA's automotive radar systems can successfully be deployed at 24 GHz and work side by side existing services.

The automotive manufacturers organized in SARA plan to use this less expensive radar technology at 24 GHz to expand significantly upon the vehicle-based assistance systems that exist today. This technology will allow for the detection of persons and objects in front of, behind and in the "blind spot" of automobiles so that injuries from automobile collisions and near collisions can be reduced significantly. The radars will operate day and night, widely independent of weather conditions. The successful completion of the current UWB proceeding would allow us to make significant progress toward offering these ground-breaking safety services to the public.

^{1/} SARA is made up of the following automobile manufacturers: *Audi, BMW, DaimlerChrysler, Fiat, Ford, General Motors, Jaguar, MAN, Opel, Porsche, PSA Peugeot Citroën, Renault, Saab, Seat, Skoda, Volkswagen and Volvo*. It also includes as members the following component manufacturers: *A.D.C., Bosch, Delphi Automotive Systems, Hella, InnoSent, Megamos, Siemens VDO, TRW, Tyco Electronics, Valeo and Visteon*.

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Again, we urge the FCC to issue a report and order in this rulemaking expeditiously to allow us to get our 24 GHz automotive radar products into the marketplace as soon as possible. By doing so, the Commission will have again promoted a far-reaching, innovative wireless technology that provides significant public safety benefits.

Very truly yours,

AUDI

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