

# BMW Group

March 17, 2003

A:FW0203

Marlene H. Dortch  
Commission's Secretary  
Office of the Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
TW-A325  
Washington, DC 20554

**Re: Notice of Proposed Rulemaking  
Regarding Dedicated Short-Range Communication Services  
in the 5.850 – 5.925 GHz Band (5.9 GHz Band)  
47 CFR Parts 2 and 90  
WT Docket No. 01-90; ET Docket No. 98-95; RM-9096; FCC 02-302  
Federal Register: January 15, 2003 (Volume 68, Number 10)**

This letter provides comments on behalf of the BMW Group (BMW) to the Notice of Proposed Rulemaking published in the **January 15, 2003** Federal Register concerning the Federal Communication Commission's proposal to amend parts 2 and 90 of the Commission's rules to allocate the 5.850 – 5.925 GHz band to the mobile service for Dedicated Short Range Communications (DSRC) of Intelligent Transportation Services (ITS). BMW also participated in the preparation of the comments submitted by the Alliance of Automobile Manufacturers and agrees with the positions stated in those comments. However, BMW has some further comments and is submitting additional supporting information.

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BMW believes that short-range wireless communication between vehicles and between vehicles and infrastructure points has the potential to significantly improve public safety. In order to pursue this potential, BMW, DaimlerChrysler, Ford, General Motors, Nissan, Toyota, and Volkswagen have formed the Vehicle Safety Communications Consortium (VSCC), in cooperation with the US Department of Transportation. The goal of the Vehicle Safety Communications (VSC) project is to evaluate potential vehicle safety applications enhanced or enabled by wireless communications, determine associated communication requirements, and promote their accommodation in the developing DSRC communications standards.

BMW strongly supports the Commission's Rulemaking for the use of the 5.9 GHz DSRC spectrum. Rules that guarantee the availability of this spectrum for the long-term support of vehicle safety applications are essential to allow the introduction of such applications and the achievement of anticipated significant safety benefits. DSRC safety applications require large-scale interoperability and a guarantee of bandwidth availability. It is our expectation that the Commission's rules will support safety applications as envisioned by the VSCC and allow their further development to continue.



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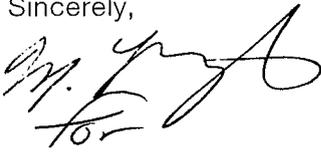
Automobiles have a long life cycle in comparison with consumer electronics devices, extending to ten years or more. In addition, the vehicle development times are long in comparison with consumer electronics products, generally spanning more than three years. The deployment of vehicle safety applications enabled by DSRC communications will therefore take some time, and the anticipated safety benefits will accrue over a much longer period as the percentage of vehicles and infrastructure equipped with these systems grows over time. Expectations of DSRC effectiveness should reflect these constraints.

BMW supports the 5.9 GHz DSRC spectrum use concept that allows private applications, both those between vehicles and those between vehicles and infrastructure, to share the spectrum with public safety applications, so long as the public safety applications have the highest priority for access to the spectrum and the private applications do not interfere with the reliable operation of the public safety applications. The control channel that is referenced in the developing standards is the tool that will be used to assure that priority. Allowing such a mixture of applications on this spectrum may lead to earlier and wider deployment of DSRC devices, while preserving the intended use of the spectrum for public safety applications.

BMW reiterates our support for the Commission's Rulemaking for the use of this spectrum. We believe that it will be the foundation for important future safety systems.

If you have any questions about this comment, please contact me at (201) 573-2068.

Sincerely,

A handwritten signature in black ink, appearing to read 'K. Ziwick', with a stylized flourish at the end.

Karl-Heinz Ziwick  
General Manager  
Environmental Engineering