

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

In the Matter of)
)
Relocate Spectrum in the 76-81 GHz frequency)
and the frequency bands above 95 GHz to make)
the domestic and international frequency)
allocations changes consistent with each other)

CC Docket No.: 03-102

TO: The Commission

**REPLY COMMENTS
BY THE
ALLIANCE OF AUTOMOBILE MANUFACTURERS, INC.**

The Alliance hereby submits the following reply comments in the above captioned matter.

Background

The Alliance of Automobile Manufacturers, Inc. (the “Alliance”) is a trade association composed of the world’s leading car and light truck manufacturers, with approximately 600,000 employees at more than 250 facilities in 35 states. Alliance members account for more than 90 percent of vehicle sales in the United States. The member companies comprising the Alliance include: BMW Group; DaimlerChrysler; Ford Motor Company; General Motors; Mazda; Mitsubishi Motors; Nissan; Porsche; Toyota; and Volkswagen.

A key function of the Alliance is to facilitate and convey the commitment of its members to important public interest goals, including the goal of improving motor vehicle safety. A number of the Alliance's members already offer adaptive cruise control (ACC) systems, which use 76-77 GHz technology, in their vehicles. Also, they plan to install short range automotive radars (SRRs) that will operate in the 22-29 GHz band in their vehicles in the very near future, which will provide important driver assistance features to customers. After reviewing the above-captioned proceeding, the Alliance wishes to offer the following comments with respect to, specifically, the amateur and amateur-satellite, radiolocation, and space research issues raised by the Commission's *Notice*. Finally, the Alliance strongly believes that a deregulatory approach is the best way for the Commission to foster the continued growth and expansion of valuable active safety offerings by automobile manufacturers.

Moving SRR frequency allocation to 77-81 GHz

The Alliance is aware of and supports the initial comments filed by the Short-range Automotive Radar frequency Allocation (SARA) Group, the Long-range Automotive Radar frequency Allocation (LARA) Group, and Delphi Corporation; and the technical work done within the EU Commission with respect to amateur and amateur-satellite, radiolocation, and space research (collectively, the "Proposed Services"). The Alliance understands that current EU discussions with SARA and LARA on eventually moving SRRs to the 77-81 GHz bands, which is adjacent to the existing 76-77 GHz ACC band, by January 2014 could eventually lead to world harmonization. We believe that the SRRs and ACC technologies will not adversely affect moving the Proposed Services into the 76-77 GHz band at this time. At the very least, the Commission should provide interference protection for vehicular radar systems vis-à-vis the Proposed Services, or require the Proposed Services to accept interference from vehicular radar systems. Since vehicular radar systems in the 76-77 GHz band are still in their nascent stage of deployment, the Commission should not tighten the current technical parameters for vehicular radar systems.

In conclusion, both ACC as well as SRRs technologies are just beginning to offer significant benefits to consumers, and likely will be expanded into additional automotive vehicle product lines over time. The market to date has fostered the development of these products and services -- which provide consumers with extremely valuable driver assistance services -- without regulatory intervention. The Alliance urges the Commission to allow this trend to continue. The Commission should avoid inhibiting the continued development of active safety technologies, or discouraging their widespread adoption, through the imposition of burdensome regulation.

The Alliance will continue to review the reply comments in this proceeding and appreciates the Commission's consideration of its views regarding this matter.

Respectfully Submitted,

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