



April 3, 2023

VIA ECFS

Marlene H. Dortch, Secretary
Federal Communications Commission
45 L Street NE
Washington, DC 20554

Re: Joint Radar-WiGig Proposal for the 60 GHz Band; Amendment of Section 15.255 of the Commission's Rules, ET Docket No. 21-264

Dear Ms. Dortch:

The Alliance for Automotive Innovation (“Auto Innovators”) hereby submits this *ex parte* letter in support of the radar operating rules agreement reached between companies utilizing unlicensed radar devices and unlicensed communications devices in the 57-64 GHz band (the “Joint Radar WiGig Proposal”).¹ The Joint Radar WiGig Proposal facilitates important innovations in 60 GHz radar design that enable vehicular use cases both onboard automobiles and outside of the cabin. The proposal also allows for meaningful coexistence with unlicensed communications offering, among other things, AR/VR WiGig applications. Accordingly, Auto Innovators encourages the Commission to expeditiously adopt this important compromise which will “materially [advance] the public interest goals behind” the *60 GHz Band NPRM* and resolve competing interests among band users.²

The Proposal Supports Critical Public Interest Goals. The Joint Radar WiGig Proposal will support unlicensed radar devices capable of providing “innovative and even life-saving functions. . . .”³ As the FCC correctly noted, several parties are already operating in the 60 GHz band under waivers of the Commission’s rules to use mobile radars to support “compelling public interest[s],” including radar technology that monitors for children inadvertently left in cars, seatbelt reminders, air bag deployment

¹ See Joint Radar WiGig Proposal, FCC, ET Docket No. 21-264 (Feb. 27, 2023) (“Joint Radar WiGig Proposal”) (proposal signatories included Amazon.com Services LLC, Continental Corporation, Garmin International, Inc., Google LLC, IEE Sensing Inc., Infineon Technologies Americas Corp., Intel Corporation, Meta Platforms, Inc., Qualcomm Incorporated, Texas Instruments Incorporated, and Vayyar Imaging LTD.).

² *Id.*

³ Comments of the Alliance for Automotive Innovation, ET Docket No. 21-264, at 2 (filed Sept. 20, 2021) (“Auto Innovators Comments”).

control, gesture control, and even anti-theft technology.⁴ Indeed, the Joint Radar WiGig Proposal will help the auto industry to meet its commitment to make rear seat reminder systems standard equipment on almost all passenger vehicles sold in the United States by the 2025 model year.⁵ Other important use cases include driver and occupant vital sign monitoring, pet detection, and door alerts for obstacles on the exterior of the vehicle.⁶

The Proposal Promotes Reasonable Coexistence in the 60 GHz Band. As the Joint Radar WiGig Proposal notes, the unlicensed radar and communications device companies engaged in various meetings and correspondence to reconcile the technical requirements behind both fixed and mobile 60 GHz band radars, and 60 GHz WiGig applications, including AR/VR communications.⁷ Accordingly, the agreement represents “a compromise among competing interests . . . that promotes reasonable coexistence among a variety of unlicensed technologies.”⁸

Given the significant public interest benefits that the Joint Radar WiGig Proposal will enable, Auto Innovators urges the FCC to promptly issue the proposed 60 GHz band rules detailed in Appendix A of the proposal.⁹

Respectfully submitted,

/s/ Hilary Cain

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⁴ See Auto Innovators Comments at 2 (citing *Amendment of Section 15.255 of the Commission’s Rules*, Notice of Proposed Rulemaking, ET Docket No. 21-264, at ¶¶ 8-9, nn.21, 25 (“60 GHz Band NPRM”).

⁵ Letter from Scott D. Delacourt, Counsel, Alliance for Automotive Innovation, to Marlene H. Dortch, Secretary, FCC, ET Docket No. 21-264, at 1 (filed Dec. 20, 2021).

⁶ Letter from Scott D. Delacourt, Counsel, Robert Bosch LLC, to Marlene H. Dortch, Secretary FCC, ET Docket No. 21-264, Attachment at 5 (filed Sept. 30, 2022).

⁷ Joint Radar WiGig Proposal at 1.

⁸ *Id.*

⁹ *Id.* at Appendix A.