

ETNO Reflection Document on the “Questionnaire for the Call for Input in the fundamental review of Commission Decision 2005/050/EC on automotive Short-Range Radar”



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Executive Summary

- ETNO believes that the SRR is already well regulated in Europe. Changing the regulation in place would lower the European institutions credibility.
- Therefore ETNO considers that the cut-off date (2013) is to be respected. Furthermore the 24 GHz solution has to remain the only interim solution up to the cut-off date, and after that date SRR will have to be deployed in the 79 GHz band only.

Introduction

ETNO is pleased to have the possibility to reply to the European Commission Questionnaire on the fundamental review of the Commission Decision 2005/50/EC on automotive short-range radar.

ETNO believes that the current EU framework already provides sufficient opportunities and a proper timetable for equipment development, as explained in more detail in this document.

ETNO answers

General

1. Is the current EU framework for the provision of radio spectrum for automotive short range radar providing sufficient opportunities for the deployment of SRR active road safety equipment without harmful interference to other radio users? If this is not the case, please explain why not and what should be modified.

ETNO believes that the current EU framework already provides sufficient opportunities and proper timetable for equipment development.

Road safety impact

2. Is automotive short-range radar able in your view to make a significant impact on road safety in the European Union? If so, please provide where possible relevant studies, quantitative statistics and estimations of benefits/results.

ETNO agrees that SRR can improve road safety; anyway, ETNO highlights that it is one of many ways to address collision avoidance. Furthermore ETNO underlines that this kind of measure is implemented only by a very limited part of the automotive industry.

Harmful interference

3. Has any harmful interference between automotive SRR systems and other spectrum users been detected to date? If so, please provide supporting information.

ETNO is not aware of any interference already detected.

4. Is there any evidence that such interference effects could take place before the reference date (30 June 2013 as defined in Decision 2005/50/EC) or in the foreseeable future beyond this date? Where this is the case, please provide supporting information, including on the potential socio-economic or public interest impact of such interference on other spectrum-using applications.

Question not relevant for ETNO.

Allowed proportion of SRR-equipped vehicles

5. Is the original assumption that a 7.0% concentration of SRR-equipped vehicles at national level operating in the 24 GHz band according to current operational specifications would give rise to harmful interference towards other spectrum users still valid?

ETNO underlines that the original technical assumption was actually 5.9%. ETNO believes that this figure is still a valid assumption.

6. If yes, will this continue to be the case until the reference date? Is there any possibility in your view that the 7.0% threshold of 24 GHz SRR-equipped vehicles at national level will be breached before the reference date?

ETNO does not see any reason for changing the regulation already in place which was developed on a technical basis and agreed by all interested parties.

7. If not, what should the SRR penetration limit be and when would this concentration be realistically achieved in the market?

See above.

8. What is your opinion on the annual review process which has been taking place to monitor the situation of SRR in the 24 GHz band? Is it adequate or should it be modified?

ETNO believes that the process is adequate. Considering the growing number of vehicles equipped with the 24 GHz SRR it is essential that the time period of 1 year is not relaxed.

Other Compatibility Assumptions

9. Are other original assumptions concerning radio compatibility between SRR and other spectrum users in the 24 GHz frequency range still valid? This includes the exclusion zones defined for 24 GHz SRR around radio astronomy site.

ETNO believes that the technical assumptions of the ECC Report 23 are still valid. Therefore all the conclusions of that Report are still valid as well.

Placing on the Market

Questions not relevant for ETNO.

The permanent 79 GHz band

Question not relevant for ETNO.

Alternative Technologies

Questions not relevant for ETNO.

The Global Dimension

Question not relevant for ETNO.

Other Issues

18. Are there any other considerations concerning automotive short-range radar which you would like to bring to the attention of the European Commission?

ETNO believes that the 24 GHz SRR band is already well regulated in Europe. Changing the regulation in place would lower the European institutions credibility, giving a wrong signal, also considering the fact that the number of vehicles equipped with these radars is very limited.

ETNO recognises that the compromise solution reached for these radars, contained in the ECC/DEC/(04)10 and 2005/50/EC decisions, was based on political pressure rather than on technical grounds.

Considering the risk that other services could suffer interference, ETNO already expressed its fear on the increased penetration rate of 7% (instead of 5.9%) and therefore considers that the cut-off date has to be respected.

Finally ETNO highlights that compatibility studies with these services (mainly Fixed Service, Radio Astronomy Service and Earth Exploration Satellite Service) conducted within CEPT and described in ECC Report 23 concluded that the deployment of 24 GHz SRR is not feasible in the long term.

Therefore the 24 GHz solution has to remain the only interim solution up to 2013, and after that date SRR will have to be deployed in the 79 GHz band only.