Chassis & Safety



Date: 07 February 2014

Federal Communications Commission Office of Engineering and Technology

Confidentiality Request concerning Test License Application – SRR3-B

ADC Automotive Distance Control Systems GmbH is a 100% subsidiary of Conti Temic microelectronic GmbH ("Conti Temic") and is registered with the objective of development, manufacture, distribution and servicing of distance warning and control systems for the automotive industry at the local court of Kempten/Germany.

Conti Temic is in turn a 100% subsidiary of UMB Beteiligungs GmbH, which is a 100% subsidiary of Continental AG.

Pursuant to Sections 0.457 and 0.459 of the Commission's Rules, we hereby request confidential treatment of information accompanying this application as outlined below:

Exhibit Type File Name

Scope and Objective of FCC Test License Application

Scope and Objective of FCC Test License Application.pdf

According to §0.459(b), we make our request based on the following reasons for withholding the materials from inspection:

(1) Identification of the specific information for which confidential treatment is sought;

The entire scope and objectives of the test experiment to be conducted under this application, as indicated in the above mentioned exhibit

(2) Identification of the Commission proceeding in which the information was submitted or a description of the circumstances giving rise to the submission;

Application for OET EXPERIMENTAL LICENSE using Form 442

(3) Explanation of the degree to which the information is commercial or financial, or contains a trade secret or is privileged;

The knowledge and information are privileged and restricted to solely ADC and its customers.

(4) Explanation of the degree to which the information concerns a service that is subject to competition;

Not applicable. The functionalities that we test (blind spot detection, lane change assist and rear cross traffic assist are already public), however, a new hardware generation is used.

(5) Explanation of how disclosure of the information could result in substantial competitive harm;



It provides privileged knowledge to our competitors of our research and development progress and plans, thereby giving them a competitive advantage.

(6) Identification of any measures taken by the submitting party to prevent unauthorized disclosure;

Such information and knowledge are strictly protected and limited to employees and customers.

(7) Identification of whether the information is available to the public and the extent of any previous disclosure of the information to third parties;

Information has not been publicized and contracted third parties are bound by Non-Disclosure Agreements. For customers involved, development contracts exist.

(8) Justification of the period during which the submitting party asserts that material should not be available for public disclosure; and

The duration of the entire experimental license shall cover the time until the market introduction (end of 2015)

(9) Any other information that the party seeking confidential treatment believes may be useful in assessing whether its request for confidentiality should be granted.

The Advanced Driver Assistance Systems market is attractive and a fast growing one. Hence, the timing and progress of our product research and development (R&D) process, and its discretion in making it public contributes critically to the overall success of the product launch. Any premature leak of such information to competitors may undercut the competitive advantages that ADC possesses.

Dr. Thomas Brohm

Vice President Development

Dr. Frank Gruson

System Engineering & Frequency



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Dr. Thomas Brohm

Vice President Development

Dr. Frank Gruson

System Engineering & Frequency



February 06, 2014

To

IBRACE - Instituto brasileiro de Certificação

The Company, ADC Automotive Distance Control Systems GmbH, located at Peter-Dornier-Str.10, D-88131 Lindau, Germany as being the manufacturer of product SRR2-A, hereby states that the above mentioned product – since last certified – has not been altered in any way, not suffering modification of its project, circuits, schemes, components, technical specifications and external appearance, except some minor changes in the power supply & CAN circuitry of the processor board. This was necessary in order to adapt the sensor to different customer interfaces.

Therefore, in terms of functionality and RF emissions, the actual product that is being sold is identical to the sample used on the last certification.

Thanks in advance.

Regards,

Dr. Thomas Brohm

Vice President Development

Frank Gruson

Manager System

Engineering & Frequency



February 06, 2014

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