

Date: 14 January 2014

Federal Communications Commission
Office of Engineering and Technology

Confidentiality Request concerning Test License Application for ARS4-A

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 (emergency braking and adaptive cruise control) 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.



Christian Zelger
Head of System Engineering



Dr. Frank Gruson
Manager Radar System Architecture