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Office of the Secretary
Int'l Trade Commission

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October 21, 2011

VIA HAND DELIVERY

The Honorable James Holbein
Secretary
U.S. International Trade Commission
500 E Street, S.W. Room 112
Washington, D.C. 20436

Re: ***In the Matter of Certain Automotive Navigation Systems, Components Thereof, And Products Containing Same, Inv. No. 337-TA-___***

Dear Secretary Holbein,

Enclosed for filing on behalf of Complainant Beacon Navigation GmbH ("Beacon" or "Complainant") are documents in support of Beacon's request that the Commission commence an investigation pursuant to Section 337 of the Tariff Act of 1930, as amended.

Prior to filing this Complaint and supporting documents, the Complainant obtained permission from the Docket Office to file certain documents accompanying this Complaint in electronic form. As described below, the original and all required copies of the Complaint are in paper form. The original and one (1) copy set of all exhibits are in paper from, and all other copies of exhibits are in electronic form and are being provided on a CD. The appendices are also in electronic form (on a CD). The Complainant will provide any additional paper copies at the Secretary's request.

Beacon submits the following documents to accompany the Complaint filing:

1. An original and twelve (12) copies of both the verified confidential and nonconfidential versions of the Complaint, and an original and six (6) copies of the accompanying nonconfidential Exhibits in electronic form (on a CD), with six (6) copies of confidential Exhibits 10, 29, 53, 54, 55, 56, 82, 83, 94 and 95 in electronic form (on a CD) segregated from the other material submitted (Commission Rules 201.6(c), 210.4(f)(3)(i) and 210.8(a));

2. Certified copies of United States Patent Nos. 6,374,180 ("the '180 patent"); 6,178,380 ("the '380 patent"); 6,029,111 ("the '111 patent"); and 5,862,511 ("the '511 patent") (jointly, "asserted patents") and legible copies thereof, referenced in the Complaint as Exhibits 1-4, respectively (Commission Rule 210.12(a)(9)(ii));

3. Copies of the assignment histories for the asserted patents, referenced in the Complaint as Exhibits 5-8, respectively; certified copies of each assignment of each of the asserted patents have been ordered from the United States Patent and Trademark Office, and will be supplemented upon receipt (Commission Rule 210.12(a)(9)(ii));

4. Certified copies of the prosecution histories of the '180 patent (Appendix A), the '380 patent (Appendix B), the '111 patent (Appendix C), the '511 patent (Appendix D); one (1) additional unbound copy of each prosecution history, and three (4) additional copies of each on CDs (Commission Rule 210.12(c)(1));

5. Four (4) copies on CD of each technical reference mentioned in the prosecution histories of the asserted patents, referenced in the Complaint as Appendices E-H (Commission Rule 210.12(c)(2));

6. Forty-nine (49) additional copies of the verified nonconfidential Complaint, including all accompanying nonconfidential Exhibits, for service upon each Proposed Respondent (Commission Rules 210.4(f)(3)(i), 210.8(a) and 210.11(a));

7. Forty-nine (49) additional copies of the confidential Complaint and confidential Exhibits 10, 29, 53, 54, 55, 56, 82, 83, 94 and 95 for service upon a representative of each Proposed Respondent who has properly subscribed to the protective order in this mater (Commission Rules 210.4(f)(3)(i), 210.8(a) and 210.11(a));

8. Five (5) additional copies of the non-confidential Complaint for service upon the Embassies of Germany, Japan, Republic of Korea, Sweden and the United Kingdom of Great Britain and Northern Ireland, in Washington, D.C. (Commission Rules 210.8(a) and 210.11(a)(1)(ii)).

9. A letter and certification pursuant to Commission Rules 201.6(b) and 210.5(d) requesting confidential treatment of the confidential Complaint and confidential Exhibits 10, 29, 53, 54, 55, 56, 82, 83, 94 and 95.

Respectfully Submitted,

Robert E. Freitas /RDT

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The Honorable James Holbein
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500 E Street, S.W. Room 112
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Re: ***In the Matter of Certain Automotive Navigation Systems, Components Thereof, And Products Containing Same, Inv. No. 337-TA-____***

Dear Secretary Holbein,

In accordance with Commission Rules 201.6(b) and 210.5(d), Beacon Navigation GmbH hereby requests confidential treatment of the confidential business information redacted from the public version of the Complaint and from the public versions of Exhibits 10, 29, 53, 54, 55, 56, 82, 83, 94 and 95.

The information for which confidential treatment is sought is proprietary commercial information not otherwise publicly available. Specifically, the information redacted from the public version of the Complaint and from the public versions of Exhibits 10, 29, 53, 54, 55, 56, 82, 83, 94 and 95 includes proprietary information about Beacon and a Beacon licensee, including proprietary business and financial information, which information is not publicly available.

The information described above qualifies as confidential business information pursuant to Rule 201.6(a) because:

a. it is not available to the public; and

b. unauthorized disclosure of such information could cause substantial harm to the competitive position of Beacon.

Please contact me if you have any questions regarding this request, or if this request is not granted in full.

Respectfully Submitted,

Robert E. Freitas

PUBLIC VERSION

UNITED STATES INTERNATIONAL TRADE COMMISSION
WASHINGTON, D.C.

In the Matter of	
CERTAIN AUTOMOTIVE GPS NAVIGATION SYSTEMS, COMPONENTS THEREOF, AND PRODUCTS CONTAINING SAME	**Investigation No. 337-TA-____**

COMPLAINT OF BEACON NAVIGATION UNDER SECTION 337 OF THE TARIFF ACT OF 1930, AS AMENDED

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PUBLIC VERSION

TABLE OF CONTENTS

I. INTRODUCTION 1

II. COMPLAINANT 6

A. Beacon Navigation GmbH 6

III. PROPOSED RESPONDENTS 6

A. Audi 6

B. BMW 7

C. Chrysler 8

D. Ford 9

E. GM 9

F. Honda 10

G. Hyundai 11

H. Kia 12

I. Mazda 13

J. Mercedes 14

K. Nissan 14

L. Porsche 15

M. Saab 16

N. Suzuki 17

O. Jaguar/Land Rover 17

P. Toyota 18

Q. Volkswagen 20

R. Volvo 21

IV. THE TECHNOLOGY AT ISSUE 21

A. U.S. Patent No. 6,374,180 22

B. U.S. Patent No. 6,178,380 23

C. U.S. Patent No. 6,029,111 25

D. U.S. Patent No. 5,862,511 26

V. UNLAWFUL AND UNFAIR ACTS OF PROPOSED RESPONDENTS – PATENT INFRINGEMENT 28

VI. SPECIFIC INSTANCES OF UNFAIR IMPORTATION AND SALE 69

VII. HARMONIZED TARIFF SCHEDULE ITEM NUMBERS 77
VIII. RELATED PROCEEDINGS 77
IX. DOMESTIC INDUSTRY 78
A. Beacon's Licensee's Domestic Industry 78
X. RELIEF REQUESTED 81

PUBLIC VERSION

TABLE OF EXHIBITS

Exhibit	Document
Ex. 1	Certified copy of U.S. Patent No. 6,374,180
Ex. 2	Certified copy of U.S. Patent No. 6,178,380
Ex. 3	Certified copy of U.S. Patent No. 6,029,111
Ex. 4	Certified copy of U.S. Patent No. 5,862,511
Ex. 5	Certified copies of recorded assignments for '180 patent
Ex. 6	Certified copies of recorded assignments for '380 patent
Ex. 7	Certified copies of recorded assignments for '111 patent
Ex. 8	Certified copies of recorded assignments for '511 patent
Ex. 9	List of public foreign patents and patent applications related to Asserted Patents
Ex. 10	**Confidential**: List of entities licensed to Asserted Patents
Ex. 11	Exemplary claim chart- Audi
Ex. 12	Exemplary claim chart- BMW
Ex. 13	Exemplary claim chart- Chrysler
Ex. 14	Exemplary claim chart- Ford
Ex. 15	Exemplary claim chart- GM
Ex. 16	Exemplary claim chart- Honda
Ex. 17	Exemplary claim chart- Hyundai
Ex. 18	Exemplary claim chart- Kia
Ex. 19	Exemplary claim chart- Mazda
Ex. 20	Exemplary claim chart- Mercedes
Ex. 21	Exemplary claim chart- Nissan
Ex. 22	Exemplary claim chart- Porsche
Ex. 23	Exemplary claim chart- Saab
Ex. 24	Exemplary claim chart- Suzuki
Ex. 25	Exemplary claim chart- Jaguar/Land Rover
Ex. 26	Exemplary claim chart- Toyota
Ex. 27	Exemplary claim chart- Volkswagen
Ex. 28	Exemplary claim chart- Volvo
Ex. 29	**Confidential:** Exemplary claim chart- [redacted]
Ex. 30	Audi Q7 with navigation for sale in United States

Exhibit	Document
Ex. 31	BMW M3 with navigation for sale in United States
Ex. 32	Mini Cooper Hardtop with navigation for sale in United States
Ex. 33	Chrysler 300 with navigation for sale in United States
Ex. 34	Ford Fusion with navigation for sale in United States
Ex. 35	Chevrolet Equinox with navigation for sale in United States
Ex. 36	Honda Fit with navigation for sale in United States
Ex. 37	Acura MDX with navigation for sale in United States
Ex. 38	Hyundai Veracruz with navigation for sale in United States
Ex. 39	Kia Sportage with navigation for sale in United States
Ex. 40	Mazda CX-9 with navigation for sale in United States
Ex. 41	Mercedes E350 with navigation for sale in United States
Ex. 42	Nissan 370Z with navigation for sale in United States
Ex. 43	Infiniti G37 with navigation for sale in United States
Ex. 44	Porsche Cayenne with navigation for sale in United States
Ex. 45	Saab 9-5 with navigation for sale in United States
Ex. 46	Suzuki SX4 with navigation for sale in United States
Ex. 47	Jaguar XJ with navigation for sale in United States
Ex. 48	Land Rover Range Rover with navigation for sale in United States
Ex. 49	Toyota 4Runner with navigation for sale in United States
Ex. 50	Lexus RX 350 with navigation for sale in United States
Ex. 51	Volkswagen Routan with navigation for sale in United States
Ex. 52	Volvo XC60 with navigation for sale in United States
Ex. 53	**Confidential**: Patent Transfer and License Agreement between [redacted]
Ex. 54	**Confidential:** Sales Receipt for [redacted]
Ex. 55	**Confidential:** Sales Receipt for [redacted]
Ex. 56	**Confidential:** List of Domestic Industry Products
Ex. 57	Excerpt of Audi webpage ("Audi Webpage")
Ex. 58	BMW Owner's Manual for Vehicle, 2011 328i, 328i xDrive, 335i, 335i xDrive, 335is, and M3 ("BMW Manual")
Ex. 59	Excerpt of Cooper webpage ("Cooper Webpage")
Ex. 60	Excerpt of Chrysler 300 webpage ("Chrysler Webpage")

Exhibit	Document
Ex. 61	Mopar Selects Garmin – Built GPS Automotive Navigator, Jan. 31, 2005 ("Mopar Garmin Article")
Ex. 62	Excerpt of Ford Fusion webpage ("Ford Webpage")
Ex. 63	SiRF launches GPS chip for in-dash nav systems, February 5, 2009 ("SiRF Article")
Ex. 64	M/A-COM Dead Reckoning GPS Module, June 4, 2009 (interview video available at http://www.engineeringtv.com/video/MA-COM-Dead-Reckoning-GPS-Modul) ("M/A-COM Video")
Ex. 65	2011 Chevrolet Equinox and GMC Terrain Navigation System ("GM Manual")
Ex. 66	2011 Honda Civic Navigation Manual ("Honda Manual")
Ex. 67	2011 Acura MDX Navigation Manual ("Acura Manual")
Ex. 68	Excerpt of Hyundai webpage ("Hyundai Webpage")
Ex. 69	Excerpt of Kia webpage ("Kia Webpage")
Ex. 70	2009 Mazda CX-9 Navigation System Manual ("Mazda Manual")
Ex. 71	2010 Mercedes E350 COMAND Operator's Manual ("Mercedes Manual")
Ex. 72	2011 Nissan Navigation System Owner's Manual ("Nissan Manual")
Ex. 73	2011 Infiniti Navigation System Owner's Manual ("Infiniti Manual")
Ex. 74	2011 Suzuki SX4 Brochure ("Suzuki Brochure")
Ex. 75	2011 Porsche Communication Management ("Porsche Manual")
Ex. 76	Excerpt of 2011 Jaguar XF Owner's Handbook ("Jaguar Manual")
Ex. 77	Excerpt of 2011 Land Rover Range Rover Owner's Handbook ("Land Rover Manual")
Ex. 78	Excerpt of 2011 Toyota 4Runner Navigation Manual, introduction ("Toyota Manual Intro")
Ex. 79	Excerpt of 2011 Toyota 4Runner Navigation Manual, appendix ("Toyota Manual Appendix")
Ex. 80	Excerpt of Volkswagen webpage ("Volkswagen Webpage")
Ex. 81	Volvo S60 & XC60 Volvo Navigation System Operating Manual, Web Edition ("Volvo Manual")
Ex. 82	**Confidential:** [redacted]
Ex. 83	**Confidential:** [redacted]
Ex. 84	Kinematic Azimuth Alignment of INS using GPS Velocity Information, A.O. Salycheva and M.E. Cannon, January 26-28, 2004

Exhibit	Document
Ex. 85	Crossbow, Datum Transformations of NAV420 Reference Frames, Giri Baleri
Ex. 86	Accuracy Improvement of Low Cost INS/GPS for Land Applications, E.H. Shin and Dr. N. El-sheimy, ION NTM 2002, 28-30 January 2002
Ex. 87	SiRF GPS solution for Car and Navigation system applications, Jerry Juan, March 23, 2006
Ex. 88	SiRF's Federated Filter Architecture for Automotive Dead Reckoning, Keith Brodie, GPS 99
Ex. 89	u-blox Automotive Dead Reckoning technology
Ex. 90	Intentionally Omitted
Ex. 91	An Urban Map Matching Algorithm using Rough Sensor Data, Shu Liu, et. al., 2008 Workshop on Power Electronics and Intelligent Transportation Systems, 2008
Ex. 92	CV of Dr. Philip Dafesh
Ex. 93	CV of Dr. Blaine F. Nye
Ex. 94	**Confidential:** Declaration of Dr. Blaine F. Nye
Ex. 95	**Confidential:** Declaration of Dr. Philip Dafesh

APPENDICES

Appendix	Document
App. A	Certified copy of the prosecution history of U.S. Patent No. 6,374,180
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App. G	Each technical reference identified in the prosecution history of U.S. Patent No. 6,029,111
App. H	Each technical reference identified in the prosecution history of U.S. Patent No. 5,862,511

[redacted]

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United States after

ning system ("GPS")

at infringe at least one

and 15 of U.S. Patent

atent No. 6,178,380

29,111 ("the '111

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Navigation, Inc., one

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