



January 23, 2019

Rules Docket Clerk
U.S. Department of Transportation
1200 New Jersey Avenue SE
Washington, DC 20590

RE: Comment on the notice of request for comments Docket ID: DOT-OST-2018-0210
posted 12/26/2018 titled "V2X Communications"

Dear Rules Docket Clerk:

The following comments to the Docket No. DOT-OST-2018-0210 are submitted on behalf of the American Traffic Safety Services Association (ATSSA). The association represents the manufacturers and installers of traffic safety devices as well as roadway owners interested in traffic safety. ATSSA's Core Purpose is *To Advance Roadway Safety* and eliminate all roadway fatalities. Our members are on the front lines in temporary traffic control zones and the invention, manufacture, sale and installation of most of the traffic control devices used on our nation's roadways.

First, ATSSA would like to thank the Department of Transportation (DOT) for the opportunity to comment on connected vehicles, including vehicle-to-vehicle (V2V), vehicle-to-infrastructure (V2I), and vehicle-to-pedestrian (V2P) communications, collectively referred to as "V2X" communications. We would like to commend DOT for requesting comments on the constantly changing technologies associated with communication that will significantly impact the roadway safety industry and will shape the future over the next 5, 10, 20 years and beyond. Critical thought and comments from all stakeholders are needed because 37,133 people died in the United States in motor vehicle crashes in 2017.¹ We encourage DOT to work with industry leaders, including ATSSA, as we support advances in roadway safety and the elimination of all roadway fatalities as soon as possible.

As a leader in the road safety industry, ATSSA was the very first membership association to support the nationwide Toward Zero Deaths (TZD) initiative. The TZD national strategy on highway safety calls for all stakeholders to champion the effort with deliberate action. With the notion that one death is too many, we all must move the message forward to bring down the number of annual deaths to zero. Many organizational stakeholders, along with ATSSA, understand our vital role as a conduit for change. A collaborative effort is needed, through the public and private sector, to advance the TZD initiative in a way that induces action by all stakeholders, including individual road users. Balancing safety and innovation will be key to ensure that private industry and government sustain a safe transportation system.

While ATSSA does not have particular expertise in the communications technologies cited by the USDOT, we think that it is vitally important that V2I and I2V technologies

¹ <https://www.nhtsa.gov/press-releases/us-dot-announces-2017-roadway-fatalities-down>

communicate *the exact same message* to automated or autonomous vehicles as is communicated to Human Driven Vehicles (HDVs). We anticipate that the United States will experience a mixed vehicle fleet for several decades and that this communication consistency is vitally important to avoid potential conflicts between HDVs and automated vehicles. This would include, but not be limited to, lane keeping, regulatory posting such as speed limits, warning signs, directional signs, attractions, etc.

Nowhere is this more important than in work zones, an area of particular challenge to automated vehicles. Work zone fatalities have been on the rise each of the last five years with 799 fatalities in 2017. This is of particular interest to our members who employ the workers on the front lines that are improving our nations roadways.

Work zones are dynamic and may present challenges to communication technologies to identify these vulnerable workers and properly navigate the area. We want to ensure that no matter what technologies are selected that they be tested appropriately prior to being deployed and implemented in the real world, which would include long duration work zones as well as mobile work zones. Mobile operations are more dynamic than typical stationary work zones and vehicle communication solutions need to be proven to ensure safety for everyone.

Again, we express our thanks to DOT for the opportunity to provide this input and offer our assistance in communicating with industry in a public forum environment should the agency seek additional information.

Respectfully submitted,

Roger A. Wentz
President and CEO
American Traffic Safety Services Association