



January 30, 2019

National Highway Traffic Safety Administration
West Building, Ground Floor
Room W12-140
1200 New Jersey Avenue, S.E.
Washington, D.C. 20590

Re: Tesla Comments Regarding V2X Communications
Docket No. DOT-OST-2018-0210-0001

To Whom It May Concern:

Tesla is pleased to submit written comments to the Department of Transportation (“DOT”) in response to the Agency’s Request for Comments (“RFC”) regarding V2X communications. Tesla continues to believe that V2X communications should not be mandatory because the safety benefits are speculative and largely subsumed by the benefits of vehicle automation, and the technology has not become sufficiently standardized. Notwithstanding, we urge the DOT to continue to maintain the 5.9GHz spectrum for V2X communications and support expansion to include both DSRC and C-V2X.

C-V2X is now poised to offer several advantages over DSRC, while also offering a higher deployment likelihood. C-V2X is a more reliable protocol because it utilizes a synchronized signal that enables greater data density within the bandwidth. In doing so, the signal is less likely to be interrupted by interference. In addition, C-V2X is expected to have significant range improvement over DSRC.

C-V2X is also more likely to be adopted in other vehicle markets. It is under consideration as a delegated act in the European Union, and is the only technology under consideration in China. Empowering C-V2X offers a greater likelihood of harmonization across global markets, which increases the likelihood of adoption.

DSRC and C-V2X would utilize the same information exchange protocol and, therefore, would be expected to achieve similar privacy and security. For this reason, we see little negative consequence from the DOT supporting the expansion of the 5.9 GHz spectrum.

The value of V2X technology depends on a high degree of fleet saturation. Rather than investing in a vestigial technology like DSRC, investing in a technology platform like C-V2X that is technology-driven and synergistic with customer demands creates the best chance for widespread adoption. C-V2X

inherently builds upon 4G LTE and the likely eventual migration to 5G. In doing so, C-V2X is more easily packable into the cellular radio that many chipmakers are already planning and that many vehicle manufacturers are likely to equip onto vehicles in the next few years. All Tesla vehicles come standard with an LTE cellular modem, which improves safety, convenience, and reliability. We expect other manufacturers will follow Tesla's lead in the coming years. By building on expected technology, C-V2X is more likely to be equipped sooner and without any mandate.

Tesla appreciates this opportunity to share our comments on the RFC. If the DOT has any questions or comments regarding this submission, please feel free to contact Eric Williams at erwilliams@tesla.com.

Sincerely,

A handwritten signature in black ink that reads "Al Prescott". The signature is written in a cursive, slightly slanted style.

Al Prescott
Deputy General Counsel and
Director of Regulatory Affairs