

February 22, 2019

Mr. Finch Fulton
Deputy Assistant Secretary for Transportation Policy
Office of the Secretary (OST)
U.S. Department of Transportation (DOT)
1200 New Jersey Avenue S.E.
Washington, DC 20590

Washington Office
101 Constitution Ave., N.W.
Suite 375 East
Washington, D.C. 20001
(202) 789-7850
Fax: (202) 789-7859
Web: <http://www.asce.org>

Re: Docket No. DOT-OST-2018-0210; ASCE Comments for the Notice of Request for Comments “V2X Communications”

The American Society of Civil Engineers (ASCE) is pleased to submit the following comments to the US Department of Transportation (DOT) on the notice of request for comments “V2X Communications,” issued on December 26, 2018. ASCE supports the planning and development of connected and autonomous vehicles (CAV) as part of a safer, more integrated surface transportation network. ASCE also encourages the Department to support the deployment of vehicle-to-vehicle (V2V), vehicle-to-infrastructure (V2I), and vehicle-to-pedestrian (V2P) communication, collectively known as V2X communications, to reduce traffic-related fatalities and serious injuries while also supporting stronger planning, design, operation, and maintenance of surface roadways.

Founded in 1852, ASCE is the oldest national engineering organization in the nation and represents more than 150,000 civil engineers in private practice, government, industry, and academia. ASCE members are dedicated professionals who hold paramount public health, safety, and welfare as they design, build, construct, operate, and maintain the built environment. It is through this commitment that our members recognize the impacts of evolving technologies and advocate for policies that enhance human safety and strengthen the quality of our nation’s infrastructure.

The 5.9 GHz band of spectrum is critical in order to provide a dedicated platform for high-speed, secure, reliable and interoperable communication between vehicles and with the infrastructure and road users.. As DOT continues to develop a framework for safely integrating CAVs into our nation's surface transportation system, ASCE supports preserving the entire 5.9 GHz band for interoperable V2X communication.

ASCE’s *2017 Infrastructure Report Card*, which gave the nation’s infrastructure a grade of “D+,” states that infrastructure challenges remain significant, but solvable. We can address our infrastructure deficit through strategic and sustained investment, bold leadership, thoughtful planning, and careful preparation for the needs of the future. Leaders from all levels of government, business, labor, and nonprofit organizations must come together to ensure all investments are spent wisely, prioritizing projects with critical benefits to the economy, public safety, and quality of life.

Emerging technologies such as CAVs and V2X communications, must be considered as viable tools to enhance existing transportation infrastructure, foster connected communities, enhance mobility, and save lives. Preserving the 5.9 GHz band so that it is secure, interoperable, and dedicated to vehicle safety is essential to achieving the full benefit of V2X communications.