



February 21, 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

Re: Docket No. DOT-OST-2018-0210;

Dear Deputy Assistant Secretary for Transportation Policy Fulton:

The Association of Metropolitan Planning Organizations (AMPO) is pleased to offer the following comments in response to the United States Department of Transportation's (USDOT) V2X Communications Notice of Request for Comments (Docket Number DOT-OST-2018-0210), issued on December 26, 2018. AMPO represents the needs and interests of metropolitan planning organizations (MPOs) nationwide and serves as a liaison between MPOs and the federal government.

MPOs are stewards of the transportation system within their metropolitan planning areas. They work with other stakeholder agencies to ensure its safe operation, and therefore are focusing on the safe deployment of connected and automated vehicle (CAV) technologies with minimal disruptions or negative impacts to the transportation system and its users. MPOs are concerned with ensuring that all transportation users, including youth, low income, minority, and elderly populations and individuals with disabilities are provided equal access to the transportation system and the benefits of CAV technology, and do not receive a disproportionate share of any negative consequences as CAVs are deployed and implemented.

A major challenge facing MPOs is the considerable uncertainty in the timeline for deployment of these technologies and the impacts on safety, security, capacity, congestion, mobility, mode options, freight movement, and other aspects of the transportation system and built environment. While the current unknowns make it challenging to represent a future with CAV technology in the long-range planning process, scenario planning, and MPO products, such as the Long Range Transportation Plan and Transportation Improvement Program (TIP), AMPO and its member organizations look forward to our continued work in partnership with the United States Department of Transportation (USDOT) and the FHWA to develop and provide

important resources that will allow for MPOs to successfully leverage the benefits of CAV technology and ensure a safe and equitable transportation system for all users.

AMPO and its members recognize the tremendous potential benefits that connected and autonomous vehicles could bring to the surface transportation system, including improved safety, increased capacity, reduced congestion, and reduced environmental impacts. AMPO and the American Association of State Highway and Transportation Officials' (AASHTO) members face similar challenges, opportunities, and constraints as connected and automated vehicles are deployed. AMPO supports the comments and concerns provided by AASHTO in its comment letter to the USDOT dated February 20, 2019. AMPO submits the AASHTO comments as part of its letter along with the additional comments below:

- While we support the deployment of research and technology that facilitates the implementation of cooperative automation, we believe it should not be limited to one technology such as Dedicated Short-Range Communications to ensure that the best available option can be pursued as technology advances and evolves. AMPO would like to emphasize the need to explore all options prior to adopting a preferred technology. Based on existing data and technology applications, AMPO does not feel it is appropriate at this time to favor or rule out a technology.
- Good data-sharing practice between the public and private sector should be encouraged and the possibility of the development of a national voluntary repository of aggregate and secured data should be explored.
- Support and encourage the MPO role of providing public, partner, and stakeholder education, involvement, and engagement.
- Support the MPO role of maintaining the state of good repair to provide venues to test successful CAV technology.

AMPO appreciates the opportunity to provide comments on the V2X Communications Notice of Request for Comments. We also appreciate the USDOT's leadership and efforts in ensuring the safe implementation of connected and autonomous vehicle technology in coordination with state and local transportation agencies. We look forward to continue working with the USDOT on this subject. If you have any questions or would like to further discuss AMPO's comments, please contact Bill Keyrouze, AMPO Technical Programs Director, at 202-624-3680.

Sincerely,



DeLania Hardy
Executive Director
Association of Metropolitan Planning Organizations