

February 25, 2019

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Docket Management Facility
U.S. Department of Transportation
New Jersey Avenue SE
West Building Ground Floor, Room W12-140
Washington, D.C. 20590-0001

RE: Docket No. DOT-OST-2018-0210

The Truck and Engine Manufacturers Association (“EMA”) hereby submits comments on the notice titled: *Notice of Request for Comments: V2X Communications* (“Notice”) that the Office of the Secretary (“OST”) of the Department of Transportation (“DOT”) recently published in the Federal Register. See, 83 Fed. Reg. 66,338 (December 26, 2018).

EMA is a trade association representing the world’s leading manufacturers of heavy-duty engines and commercial motor vehicles (with a gross vehicle weight rating greater than 10,000 pounds). EMA member companies design and produce medium- and heavy-duty vehicles that are highly customized to perform a wide variety of commercial functions, including line-haul trucking, regional trucking, package delivery, refuse hauling and construction.

EMA member companies are taking active steps toward the deployment of Dedicated Short Range Communications (“DSRC”) in the 5,850-5,925 MHz frequency band (“5.9 GHz band”) for vehicle-to-vehicle (“V2V”) and vehicle-to-infrastructure (“V2I”) communications -- or collectively, vehicle-to-everything (“V2X”) communications. One of the near-term applications of those communication technologies in heavy-duty vehicles is platooning of two or more tractor-trailer combination vehicles. Platooning involves using DSRC communications to establish an electronic coupling to simultaneously control the acceleration and braking of the vehicles in order to safely minimize the gap between them to reduce aerodynamic drag and improve fuel efficiency.

We share OST’s view expressed in the Notice that:

V2X technologies have the potential for significant safety and mobility benefits, both on their own and as complementary technologies when combined with in-vehicle sensors supporting the integration of automated vehicles and other innovative applications such as platooning. (83 Fed. Reg. 66,338)

We also believe that the significant benefits of V2X communication technologies can only be reached if all seven channels of the 5.9 GHz band are protected for transportation communications. As such, the entire 5.9 GHz band must be free from harmful interference from Unlicensed National Information Infrastructure (“U-NII”) devices and cellular vehicle-to-everything (“C-V2X”) communications. To avoid disrupting the DSRC deployments that are being made based on the exclusive use of the 5.9 GHz band, DOT should work with the Federal Communications Commission (“FCC”) to conduct rigorous testing, including real-world testing, to validate that C-V2X signals in the 5.9 GHz Band will not interfere with DSRC messages.

If you have any questions, or if there is any additional information we could provide, please do not hesitate to contact Timothy Blubaugh at (312) 929-1972, or tblubaugh@emamail.org

Respectfully submitted,

TRUCK & ENGINE
MANUFACTURERS ASSOCIATION