February 25, 2019

The Honorable Elaine Chao
Secretary
U.S. Department of Transportation
1200 New Jersey Ave, SE
Washington, DC 20590

RE: Notice of Request for Comments: V2X Communications (Docket No. DOT-OST-2018-0210)

Dear Secretary Chao:

AAA thanks you for your attention to the growing need to address the future of transportation and the opportunities and implications presented by emerging technologies. We appreciate the opportunity to provide comments on the many aspects of Vehicle-to-Vehicle (V2V), Vehicle-to-Infrastructure (V2I), or more broadly, Vehicle-to-Everything (V2X) communications.

As a member-driven organization serving nearly 60 million members, our highest priority is safety on the roads. The safe testing and deployment of connected and automated vehicles is the most important thing to consider when crafting new rules and regulations. The foundation to a safe, connected transportation system, in addition to well-maintained roads, is the ability for connected technology to be able to communicate with other vehicles, infrastructure and people. Currently, Dedicated Short Range Communications (DSRC) is the only V2X technology tested and approved for use in the 5.9GHz band. We believe V2X technology has the potential to dramatically improve safety and support federal efforts under way to test spectrum sharing in order to determine if other vehicle communication technologies can safely share the 5.9GHz band. However, we firmly believe that evaluating the impacts of sharing, and any potential sharing plan, should work around current intelligent transportation operations in the band and not slow deployment of V2X. We urge the U.S. Department of Transportation (DOT) and the Federal Communications Commission to continue to work together to reserve the 5.9GHz spectrum for transportation safety purposes and ensure that the benefits of V2X can be realized.

The choice between vehicle communication technologies is a hotly debated issue whose outcome can play a significant role in the speed with which we see smooth deployment of connected vehicles. While auto companies have started to show support and dedicate resources to one technology versus another, AAA is technology neutral. Ultimately, we do believe DOT should utilize its influence and authority to incentivize manufacturers to come to an agreement over a certain technology or combination that can work seamlessly between all vehicles and connected infrastructure.

The Federal Highway Administration (FHWA) and the National Highway Traffic Safety Administration (NHTSA) play an important role in the development of V2X technology and policies, and need to continue to provide relevant regulations that keep pace with the fast moving evolution of this technology. Moreover, as noted in DOT's recently released guidance (Automated Vehicles 3.0: Preparing for the Future of Transportation), DOT has invested more than $700 million in V2X research and development over the past 20 years[1]. Those investments and partnerships with industry and state/local governments have built a network of deployments that have pushed the life-saving technologies across the country. We applaud the FHWA and NHTSA for encouraging multi-stakeholder V2X collaboration, and we encourage a continued approach to ensuring that V2X transportation safety benefits are spread further across the nation. Related to that, Congress and states have been grappling with transportation funding for many years. It will be essential moving forward that the Department of Transportation work in conjunction with Congress to identify a sustainable source of transportation funding that provides certainty to state and local governments.

Even further, DOT needs to consider standardized policies and best practices for the CAV landscape as a whole. Our major metropolitan areas, which are becoming even more densely populated, are sure to be the first areas to have largescale V2X deployment. We believe DOT should allow for and encourage sufficient real world testing that accounts for the numerous scenarios of a transportation system where partially and fully connected and automated vehicles are sharing the roads with commercial vehicles, conventional automobiles that possess no connected capabilities, pedestrians and intelligent infrastructure. This will educate the government and industry on a series of policy issues that will need to be addressed in order to prevent disruption to the transportation system.

With the widespread use of this technology, whichever one or many may become ubiquitous, a critical issue for AAA is the regulations around the privacy and distribution of data. Consumers have a right to clearly understand what information is being generated and collected from their vehicle and how it is being used. Additionally, consumers have a right to decide with whom to share their vehicle data and for what purpose. Lastly, consumers have a right to expect that connected-vehicle manufacturers and service providers will use reasonable measures to protect vehicle data systems and services against unauthorized access and misuse. While manufacturers are determining which technology to use, they need to also be keenly focused on the myriad privacy exposures that are present with so many entities sharing massive amounts of information. Now is the time, before these technologies are deployed, to establish clear rules about consumer protections and privacy controls. As we're seeing in other spheres, privacy issues can impair the consumer experience and it is far preferable to address these issues up front. Preventing unauthorized access to and manipulation of a connected infrastructure should be a priority in choosing the appropriate technology, and widespread deployment should be contingent upon significant successful testing of privacy measures.

Ultimately, continued funding and support from DOT to help the transportation industry move towards a fully integrated V2X communications system is much needed. AAA believes the safe implementation of CAVs has the potential to improve the safety of motorists, pedestrians, as well as

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[1] U.S. Department of Transportation, Automated Vehicles 3.0 Preparing for the Future of Transportation (October 2018), https://www.transportation.gov/sites/dot.gov/files/docs/policy-initiatives/automated-vehicles/320711/preparing-future-transportation-automated-vehicle-30.pdf Page 16.

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those utilizing alternative methods of transit on our roads. We encourage DOT to assist in swiftly moving to standardizing technologies and communication methods, so that testing and development can progress.

Respectfully,

Jill Ingrassia
Managing Director
AAA Government Relations and Traffic Safety Advocacy