



SAFETY SPECTRUM COALITION

February 25, 2019

Mr. Finch Fulton
Deputy Assistant Secretary for Transportation Policy
U.S. Department of Transportation
1200 New Jersey Ave., S.E. W12-140
Washington, DC 20590

Re: V2X Communications (Docket No. DOT-OST-2018-0210)

Dear Mr. Fulton:

The Safety Spectrum Coalition welcomes the opportunity to provide comments to the Department of Transportation on V2X communications and the Department's role in encouraging the integration of V2X. The Safety Spectrum Coalition represents a broad group of industries, highway users, and transportation technology, consumer, and safety advocates that support and promote the need to deploy connected vehicle safety technologies in the 5.9 GHz band and ensure communications free from harmful interference. Given the Coalition's expertise in V2X technologies and its interest in ensuring a regulatory environment that maximizes the safety benefits V2X has to offer, the Coalition hereby provides its input.

V2X services represent a breakthrough in auto safety, enabling vehicles to communicate in real time with other vehicles, roadway infrastructure, communications networks, and pedestrians to reduce traffic crashes, improve roadway safety and reduce fatalities and injuries from the current, unacceptably high level. Moreover, V2X communications can also be used to coordinate the safe movement of traffic to mitigate congestion and improve traffic flow. In April 2017 comments, the Safety Spectrum Coalition strongly supported the National Highway Traffic Safety Administration's (NHTSA's) proposed rule establishing a Federal Motor Vehicle Safety Standard requiring vehicle-to-vehicle (V2V) communications capability through dedicated short-range communications (DSRC) technology in cars and light trucks. In the absence of a new safety standard requiring V2V communications, the Department still has a

critical and urgent role to play to support safe and efficient deployment of V2X services as outlined in the following paragraphs.

The ongoing deployment of V2X infrastructure, announcements by automakers to offer DSRC V2X communications in their vehicles, and the emergence of C-V2X technology all demonstrate that significant growth and innovation is occurring in the V2X space. With the tremendous potential to improve transportation safety and the growth in demand for V2X services, it is essential that the entire 5.9 GHz band be retained for V2X and that all measures are taken to smooth the path for deployment. **As part of DOT's role in encouraging the integration of V2X, the Department must continue to work with the Federal Communications Commission (FCC) to preserve all seven channels in the 5.9 GHz band for V2X and to preserve V2X operations from harmful interference.**

As highlighted in the Department's V2X request for comment and NHTSA's 2017 V2V NPRM, interoperability of V2X services and performance of the communications medium are critical elements for V2X communications. Essential to successful V2X services is the ability for vehicles to transmit and receive the Basic Safety Message (BSM), which consists of data about a vehicle in transit that enables other vehicles on the road to avoid collisions. DOT has a central role to play in ensuring that policy supports an interoperable solution to permit V2X-equipped vehicles to exchange necessary safety data with other V2X-equipped vehicles. **DOT must continue to be an active partner with the FCC in ensuring the right policy framework is developed to advance the deployment of V2X technologies in the 5.9 band and that the supporting research and the necessary real-world testing, focused specifically on roadway safety, is conducted to assess the performance of DSRC, C-V2X, or other V2X technologies through a balanced, data-driven process.**

There have been significant investments in DSRC technology by many entities in both the public and private sectors, relying on the allocated spectrum and current channelization. Likewise, progress has been made in the development of C-V2X. Lack of clarity regarding channel allocation and spectrum rules creates a disincentive for investments in V2X technology, potentially delaying improvements in safety and efficiency for our transportation system. **To speed deployment of V2X and encourage further innovation, DOT should support policies and take actions that will remove uncertainty about channel allocation and spectrum rules, and that ensure interoperability and compatibility of communications technologies that are allowed for V2X communications.**

The Safety Spectrum Coalition stands ready to work with the Department to help bring these life-saving technologies to American roadways as soon as possible.

Sincerely,

- AAA
- American Highway Users Alliance
- American Traffic Safety Services Association

- American Trucking Associations
- Association of Global Automakers
- Commercial Vehicle Training Association
- Intelligent Transportation Society of America
- Mothers Against Drunk Driving
- Motor & Equipment Manufacturers Association
- NAFA Fleet Management Association
- National Safety Council
- Peloton Technology, Inc.