

## **Regarding: DOT-OST-2018-0210-0023 – V2X Communications**

Dear Sir/Madam:

I strongly oppose V2X communications and the use of my federal taxes to promote what actually amounts to a massive boondoggle to benefit industry as well as a massive public health hazard in the form of unprecedented levels of radiofrequency (RF) radiation that will harm the health of millions of Americans.

This docket examines whether we should use DSRC or V2X communications. As a citizen I oppose both DSRC and V2X for the two primary reasons stated above, namely, mandating either DSRC or V2X, in fact represents both an unjustifiable corporate giveaway and a severe public health threat.

More importantly, I challenge the fundamental authority of DOT to engage in the activities pertaining to this Docket.

By what authority does the Department of Transportation (DOT) propose, via V2X, a de facto invasion of privacy of virtually everyone involved in transportation on our public roadways?

By what authority does DOT propose to deploy, in the various networks and technologies necessary to build V2X, massive new levels of health-harming RF radiation?

As DOT is unable to provide a legitimate answer to these questions, I strongly oppose any new rule the DOT would promulgate, and I oppose any and all forms of mandated vehicle-to-vehicle V2X communications, for the following reasons:

**Authority** – DOT is exceeding its authority. Any decision to transition to V2X cars should be left to the people through a vote or its elected representatives through legislation.

**Safety** – A) Software based systems are just as likely to cause errors as human drivers, therefore they are trading one problem for another. Humans may be subject to judgment errors and distractions that cause accidents, but software driven systems are subject to hardware failures, software glitches, software bugs, software viruses, malware, trojan horses, ransomware, hacking, etc. One of these events could have catastrophic effects on driver safety. B) By DOT's own admissions, safety goals will not be obtained unless all cars have them and they clearly state they have no authority to mandate after market devices. More accidents will occur with a hybrid vehicle fleet on the roads. C) Alerts will cause more distractions from the road and possibly cause more accidents.

**Health** – Another layer of exposure to RF emissions and potential for dangerous hot spots as placement of antennas will not be subject to regulations. It is unconscionable to mandate these radios in light of the partial release of the NTP rat study and the incompleting FCC Docket #13-84 on reassessment of emission standards. V2X must be put on hold until both are completed.

**Privacy** – As stated by NHTSA, "... the introduction of V2V [V2X] technology creates new privacy risks that cannot be fully mitigated."

Security – No computer based system working off of wireless transmissions can be adequately secured. It is one thing to have your credit card number hacked and potentially lose some money versus the V2X system hack can claim your life.

Costs – V2X is a wasteful government-mandated boondoggle. The costs of this autonomous car future far outweigh the benefits. The costs to equip and maintain these systems in every vehicle, update the country's infrastructure to communicate effectively, manage, store and analyzed the Big Data, and secure the system, coupled with the estimated 5 million jobs lost, are not justified by the unsubstantiated benefits of reducing crashes and saved lives. One software glitch can take many more lives.

Future Crime – Autonomous vehicles have potential to increase crime in the future.

Economy – Autonomous cars will eliminate an estimated 5 million jobs for truck drivers, delivery drivers, bus drivers, taxi and limousine drivers, etc.

Conflicts of interests – There have been far too many agency employees leaving for lucrative connected cars industry jobs.

Safety Act – The proposed rule fails to meet all the elements of the Safety Act.

**In closing:**

Any radio installed in a vehicle must be able to be removed or disabled by the owner of said vehicle.

I strongly oppose mandating V2X in cars and light trucks. All roadway corridors will have significant increases in RF radiation exposure from V2X and supporting infrastructure. V2X poses increased safety hazards to drivers, passengers, people in homes who live along roadways, cyclists, and pedestrians. Increased RFR exposure from V2X threatens nature, trees, birds, bees and other insects. Vulnerable populations such as children, seniors, people with electromagnetic hypersensitivity (EHS), and people with medical implants are at greater risk of harm.

V2X technology will not make driving safer, but will make driving more harmful to people and the environment, create mobility access barriers, and should be stopped.

Please, stop your promotion of this misguided and unconstitutional V2X project.

Jason Boehk  
Sarasota, Florida 34237