

Motor & Equipment Manufacturers Association

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December 5, 2019

The Honorable Mike Doyle
Chairman
Subcommittee on Communications
and Technology
Committee on Energy and Commerce
U.S. House of Representatives
Washington, D.C. 20515

The Honorable Bob Latta
Ranking Member
Subcommittee on Communications
and Technology
Committee on Energy and Commerce
U.S. House of Representatives
Washington, D.C. 20515

RE: Letter for the Record – “Accountability and Oversight of the Federal Communications Commission”

Dear Chairman Doyle and Ranking Member Latta:

The Motor & Equipment Manufacturers Association (MEMA) is the leading trade association representing U.S. motor vehicle parts suppliers. These companies manufacture and remanufacture components, technologies, and systems for use in passenger vehicles and heavy trucks. In total, vehicle parts manufacturers represent the largest sector of manufacturing jobs in the United States, directly employing over 871,000 Americans in all 50 states and generating 2.4 percent of U.S. GDP.¹ On behalf of this industry, I respectfully submit this letter for the record to the Subcommittee in opposition to the proposal of the Federal Communications Commission (FCC) related to the 5.9 GHz band.

In November 2019, the FCC announced they will vote on a proposal to allow other uses of the 5.9 GHz band instead of maintaining the band for licensed use of transportation safety technologies. This band, dubbed by industry as the “Safety Spectrum,” has long been reserved by the government for the transportation industry, which plans to utilize this spectrum to implement and deploy critical new vehicle safety technologies. Allowing other wireless uses on the spectrum could compromise motor vehicle safety. Additionally, any significant changes to the band disrupts significant resources and investments made by industry stakeholders as well as federal, state, and local governments in anticipation of deployed connected vehicles and infrastructure.

MEMA is urging that the FCC continue to reserve the 5.9 GHz band – in its entirety – for intelligent transportation systems communications, including vehicle-to-everything (V2X) and other related communications. The reservation of this spectrum is indispensable for future safety systems and the development of automated driving. The loss of even part of the spectrum negates the well-identified life-saving benefits of transportation safety technologies. Moreover, the U.S.

¹ MEMA represents its members through four divisions: Automotive Aftermarket Suppliers Association (AASA); Heavy Duty Manufacturers Association (HDMA); Motor & Equipment Remanufacturers Association (MERA); and, Original Equipment Suppliers Association (OESA). Suppliers are the largest employers of manufacturing jobs in the United States, directly employing over 871,000 workers with a total employment impact of 4.2 million jobs.



Department of Transportation (DOT) has repeatedly emphasized its support for preservation of the 5.9 GHz spectrum. Research conducted by DOT found that unlicensed Wi-Fi in the lower 45 MHz of the 5.9 band will degrade the quality of the remaining portion of the band, threatening the functionality and reliability of critical transportation safety communications. Over the long term, splitting the spectrum will severely hinder those efforts. Once the vehicle safety spectrum is lost, it will be impossible to reclaim that bandwidth for vehicle safety purposes.

MEMA requests that the FCC refrain from finalizing any action related to the 5.9 GHz band until testing validates no harmful interference. Sharing or dividing the spectrum raises concerns as it will require the development of new testing protocols to confirm that allowing unlicensed devices does not compromise the safety as intended when the vehicle safety spectrum was first envisioned. We cannot risk losing this critical capability. Additionally, reducing and narrowing the vehicle safety spectrum limits future innovation in and growth of safety features and capabilities. Interference and compatibility are key concerns, which is why retaining the current bandwidth is necessary.

MEMA welcomes the opportunity to discuss this matter with the Subcommittee. Should you have questions or concerns, please contact Catherine Boland, vice president, legislative affairs at cboland@mema.org or 202-312-9241.

Sincerely,



Ann Wilson
Senior Vice President, Government Affairs

