

February 8, 2019

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th St. SW
Washington, DC 20554

Re: 5GAA Petition for Waiver to Allow Deployment of Intelligent Transportation System Cellular Vehicle to Everything (C-V2X) Technology, GN Docket No. 18-357

Dear Ms. Dortch:

The Safety Spectrum Coalition¹ hereby offers feedback on the Petition of the 5G Automotive Association (“5GAA”) seeking a blanket waiver of the Federal Communications Commission’s (“FCC”) rules to enable deployment of Cellular Vehicle-to-Everything (“C-V2X”) services in the upper 20 MHz of the 5.850-5.925 GHz frequency band (“5.9 GHz band”), notwithstanding the allocation of this band to Dedicated Short Range Communications (“DSRC”) services, a complementary V2X technology.²

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.

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 – all seven channels – be retained for V2X, and that all measures are taken to smooth the path for deployment.

¹ A list of the Safety Spectrum Coalition’s members is included as Attachment A.

² 5GAA Petition for Waiver to Allow Deployment of Intelligent Transportation System Cellular Vehicle to Everything (C V2X) Technology, GN Docket No. 18-357 (Nov. 21, 2018).

Central 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. Because 5GAA's Petition seeks a waiver to enable C-V2X BSM operations in the upper portion of the 5.9 GHz band—a different frequency range than that which is commonly used to transmit the BSM in DSRC-equipped vehicles—the Commission must ensure that policy supports an interoperable solution to permit V2X-equipped vehicles to exchange necessary safety data with other V2X-equipped vehicles.

In addition, although progress has been made in the development of C-V2X, there may be a need for additional safety testing to validate performance of BSM communication. The data provided in 5GAA's Petition is a useful start. Real-world testing, focused specifically on roadway safety, is necessary to complete this record and deliver the benefits the travelling public seeks.

Ultimately, given the complexities inherent in two V2X technologies co-existing in a frequency band, a rulemaking proceeding will be necessary to develop permanent rules for the 5.9 GHz band that could allow for both DSRC and C-V2X services. 5GAA's Petition indicates that it intends to file a Petition for Rulemaking on this issue. The Safety Spectrum Coalition looks forward to reviewing that proposal and engaging in that proceeding.

Respectfully Submitted,

/s/ Steve Gehring

Steve Gehring

The Association of Global Automakers, Inc.

1050 K Street NW

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ATTACHMENT A

Safety Spectrum Coalition Members

- 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
- Panasonic
- Peloton Technology, Inc.