



Mark Gordon
Governor

WYOMING Department of Transportation

"Providing a safe, high quality, and efficient transportation system"

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William T. Panos
Director

January 4, 2019

Ms. Marlene H. Dortch
Secretary
Office of the Secretary
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

Reference: Wyoming Department of Transportation comments on FCC Office of Engineering and Technology (OET) and Wireless Telecommunications Bureau (WTB) Request for Comment on 5GAA's Petition for Waiver to Allow Deployment of Cellular Vehicle-to-Everything (C-V2X) Technology in the 5.9 GHz Band (DA/FCC # DA-18-1231); [GN Docket No. 18-357]

The Wyoming Department of Transportation (WYDOT) thanks the Federal Communications Commission for the opportunity to provide comments in response to this notice. In this docket, FCC has invited comment on a request for waiver to allow deployment of cellular "vehicle to everything" technology in the 5.9 GHz band currently reserved for Dedicated Short Range Communication (DSRC).

Comments:

Support for Filing by the American Association of State Highway and Transportation Officials (AASHTO)

At the outset, WYDOT wishes to endorse and support comments made in this docket by AASHTO on behalf of its membership, including our department. WYDOT projects and concerns are directly addressed in the AASHTO filing, and we wish to draw your attention to these comments.

WYDOT Connected Vehicle Pilot Study Using DSRC in the Dedicated 5.9 GHz Bandwidth

As referenced in the AASHTO comments, WYDOT is currently conducting a pilot study of connected commercial and state fleet vehicles to determine the effectiveness of connected vehicle technology to reduce winter weather-related collisions and improve overall road safety along Interstate 80 in southern Wyoming. The technology employs dedicated short range communications equipment deployed both in individual vehicles and in roadside infrastructure. This study, along with several others ongoing throughout the country, will help determine the suitability of this technology for nationwide deployment. Real-world deployment of this DSRC equipment is just now beginning. Opening spectrum currently reserved for DSRC prematurely has the potential to hamper development of all technologies using 5.9 GHz spectrum and deny

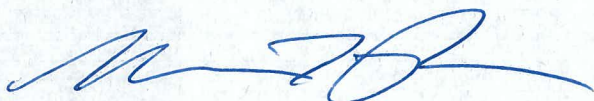
current roadway users the near-term safety benefits of DSRC while other technologies are being developed.

Potential for Signal Interference

The petitioner's (5GAA's) comments indicate that opening the 5.9 GHz bandwidth to cellular vehicle-to-everything technology will not create signal interference with current DSRC deployment, especially if channels available in the bandwidth are used in addition to the two current active channels. This assertion, however, has not been sufficiently tested to determine its reliability. With the burgeoning number of DSRC deployments throughout the nation, the additional testing required to verify this hypothesis should be conducted. WYDOT does not take a position on whether this substantiation process requires additional rulemaking (as AASHTO requests) or can be accommodated under a thorough petition process. It is imperative, however, that careful examination occur before any modification to the 5.9 GHz spectrum use—no matter the long-term promise of nascent technology.

The Wyoming Department of Transportation thanks FCC for its consideration and hopes that these comments are duly considered and that the Commission acts in a manner consistent with them to safeguard highway safety.

Sincerely,

A handwritten signature in blue ink, appearing to read 'W. Panos', with a stylized flourish at the end.

William T. Panos
Director