

Daimler North America  
Corporation

January 18, 2019

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street SW  
Washington, DC 20554

Re: *GN Docket No. 18-357; 5GAA Petition for Waiver to Allow Deployment of Cellular Vehicle-to-Everything (C-V2X) Technology in the 5.9 GHz Band*

Dear Ms. Dortch:

Daimler supports the waiver request filed by the 5G Automotive Association (“5GAA”) seeking permission to deploy cellular vehicle-to-everything (“C-V2X”) in the upper portion of the 5.9 GHz band.

Daimler Group subsidiaries have been firmly established in the United States for decades. As employers, exporters, and good corporate citizens, they provide billions of dollars in direct and indirect support to the U.S. economy. Today Daimler Group Companies employ around 26,000 people in the United States – 8.7% of the Group’s worldwide workforce. The Companies indirectly support an estimated 150,000 additional jobs across the country. At 23 main locations throughout the U.S., the Group’s subsidiaries primarily manufacture passenger cars and commercial vehicles, but is also represented with Daimler Financial Services, car2go and moovel as well as several Research and Development locations.

Daimler is committed to reducing roadway fatalities, fossil fuel emissions, and traffic congestion on the highways of tomorrow. Vehicle-to-Everything (“V2X”) technologies represent one component of our plan to accomplish this goal. These technologies, which can enable communications among vehicles, the infrastructure, and other road users, can unlock a variety of services that will not only improve highway safety, but also increase traffic efficiency, reduce energy consumption, and yield numerous other mobility and societal benefits. The Federal Communications Commission (“FCC”) can help advance the realization of these benefits by granting 5GAA’s waiver request to allow for the near term deployment of C-V2X, a promising new V2X technology.

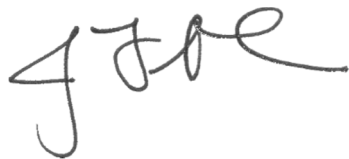
Historically, Dedicated Short Range Communications (“DSRC”) technology was the only available V2X technology. Today, that is no longer the case. C-V2X is a modern V2X technology with an evolution path to 5G. Ultimately, C-V2X may be able to deliver new and improved V2X services to vehicles and drivers.

Daimler is evaluating the benefits of C-V2X,<sup>1</sup> and, as part of these efforts, is a member of 5GAA, the global organization promoting the development and advancement of C-V2X around the world.

The FCC can help facilitate the continued advancement of C-V2X by granting 5GAA's waiver request. Allowing for C-V2X operations in a portion of the 5.9 GHz band will afford industry stakeholders the certainty necessary to increase investment and innovation in C-V2X. It also will level the playing field between C-V2X and DSRC, which will allow automobile manufacturers, and not regulators, to select the best V2X technology. Ultimately, this approach will ensure that consumers can enjoy the benefits provided by the best V2X technology available and that such technology is robustly deployed. This approach is not only consistent with the FCC's historic approach to communications services, but it also is consistent with the USDOT's position that it will not promote any particular V2X technology over another.

With the proliferation of V2X technologies, we are able to further strengthen automotive safety through vehicle connectivity. V2X technology is one component of Daimler's plan for improving safety, mobility, and traffic efficiency, and, as part of this plan, Daimler is exploring the benefits of C-V2X. The FCC can help accelerate the advancement, investment, and innovation in V2X technologies by granting 5GAA's waiver request. A grant will ensure an even playing field that will allow automobile manufacturers to determine the best technology for delivering the safety and other important societal benefits made possible by V2X services.

Thank you very much for your consideration of 5GAA's waiver request.

A handwritten signature in black ink, appearing to read 'J Nigro', with a stylized flourish at the end.

Jessica Nigro  
General Manager, Technology and Innovation Policy

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<sup>1</sup> Jessica Nigro, Daimler North America Corporation, *Cellular Vehicle-to-Everything ("C-V2X") Technology Will Deliver on the Promise of Safer Streets*, Eno Center for Transportation, Sept. 10, 2018, <https://www.enotrans.org/article/cellular-vehicle-to-everything-c-v2x-technology-will-deliver-on-the-promise-of-safer-streets>.