

# VOLKSWAGEN

GROUP OF AMERICA

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

Thomas Zorn	Name
Senior Director	Title
Safety Affairs & Advanced Research	Dept.
248-754-6480	Phone
248-754-4511	Fax
<a href="mailto:thomas.zorn@vw.com">thomas.zorn@vw.com</a>	e-mail
January 18, 2019	Date

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:

Volkswagen Group of America Inc. is pleased to submit the following Comments in response to the Petition for Waiver submitted by the 5G-Automobile Association ("5GAA") to the Federal Communications Commission ("FCC" or "Commission") in GN Docket No. 18-357.

The Volkswagen Group of America encompasses five automotive brands operating in the North American market, led by Volkswagen and Audi. Together, our businesses have been at the forefront of research and development efforts for both Dedicated Short Range Communications ("DSRC") and Cellular Vehicle to Everything ("C-V2X") technologies. Our goal for this work is rooted in a desire to advance road safety while minimizing the impact of congestion and future emissions in the communities we serve.

VOLKSWAGEN GROUP OF AMERICA  
3800 HAMLIN RD  
AUBURN HILLS, MI 48326  
PHONE +1 248 754 5000

With new mobility and transit models rapidly evolving, the need has never been more profound for vehicles, pedestrians and infrastructure to efficiently and safely communicate with each other through the Intelligent Transportation Systems Radio Service (ITS-RS) in the 5.850-5.925 GHz band ("5.9 GHz band"). The foresight of the FCC to allocate this spectrum in the late 1990s for innovations to come truly placed the U.S. as a global leader in the mobility revolutions at hand.

This is why we urge the Commission to protect the entire 5.9 GHz band for road safety applications – and thereby give innovators the certainty and flexibility they need to continue their deployment plans. The 5GAA petition provides further proof that emerging technologies like C-V2X and 5G-V2X could provide additional benefits to the public good if allowed to share the 5.9 GHz ITS-RS spectrum. It is our position and belief that this deployment must not create any interference or latency for DSRC communications and must meet protocols developed by the FCC before introduction.

Thank you for considering our comments.

Sincerely,  
VOLKSWAGEN GROUP OF AMERICA, INC.



Thomas Zorn  
Senior Director  
Safety Affairs and Advanced Research