



Thomas A. Schatz
President

October 12, 2018

Chairman Ajit Pai
Federal Communications Commission
445 12th Street, SW
Washington, D.C. 20554

Commissioner Jessica Rosenworcel
Federal Communications Commission
445 12th Street, SW
Washington, D.C. 20554

Commissioner Michael O'Rielly
Federal Communications Commission
445 12th Street, SW
Washington, D.C. 20554

Commissioner Brendan Carr
Federal Communications Commission
445 12th Street, SW
Washington, D.C. 20554

Re: Notice of Proposed Rulemaking on Unlicensed Use of the 6 GHz Band (ET Docket No. 18-295; GN Docket No. 17-183)

Dear Chairman Pai, Commissioners Rosenworcel, O'Rielly, and Carr,

On behalf of the more than one million members and supporters of Citizens Against Government Waste (CAGW), I am writing to request that during the upcoming proceeding on the Proposed Rulemaking on Unlicensed Use of the 6 GHz Band (ET Docket No. 18-295; GN Docket No. 17-183), the commission expand this docket to include the spectrum between the 5.725 GHz U-NII-3 band currently used for Wi-Fi applications and 5.925 GHz in order to allow it to be considered for additional unlicensed Wi-Fi use, including shared use.

In 1999, the Department of Transportation was given access to spectrum in the 5.9 GHz band for the development of dedicated short-range communications (DSRC) for vehicle-to-vehicle (V2V) communications. Development of DSRC remained relatively stagnant until 2017, when General Motors deployed the technology in one vehicle model, the Cadillac CTS. On April 16, 2018, Toyota announced that it would develop and deploy the technology in all its vehicles beginning in 2021.¹

¹ "Toyota and Lexus to Launch Technology to Connect Vehicles and Infrastructure in the U.S. in 2021," Toyota, April 16, 2018, <https://corporate.toyota.com/releases/toyota+and+lexus+to+launch+technology+connect+vehicles+infrastructure+in+u+s+2021.htm>.

Over the past two decades, autonomous innovations in the automotive industry have included lane-keeping support systems; blind spot information technology; LIDAR; highway traffic management; and automated parking. According to the Auto Alliance, automobile manufacturers spend more than \$100 billion each year on research and development worldwide and are actively working on new safety and V2V communications technologies.² These new technologies rely on sensors, cameras, and radar-based technologies to alert drivers to impending dangers and blind spots. DSRC technology must be fully utilized in all vehicles (old and new) to be completely functional, rendering existing and future technologies that do not use DSRC useless or duplicative, even if they are more effective.

In December 2016, the National Highway Traffic Safety Administration issued proposed rules requiring auto manufacturers to deploy DSRC in all light vehicles by 2023. Fortunately, the Department of Transportation has placed this proposed rulemaking on hold. CAGW contacted Transportation Secretary Elaine Chao on September 7, 2017, asking her to review the agency's use of the 5.9 GHz spectrum considering the many developments in V2V technology.³

Certain segments of the automotive industry continue to apply pressure to preserve the 1999 allocation of spectrum for DSRC, even though it took 18 years for the first vehicle using DSRC to become available.⁴ As Commissioner O'Rielly noted in his 2016 blog post, public safety is a primary concern when considering shared use of the 5.9 GHz spectrum.⁵ However, it appears that the industry has little intention of using DSRC other than for location information, electronic tolling and financial applications, freight logistics and navigation.⁶

We urge the commission to expand its evaluation and proposed rulemaking of the 6 GHz spectrum band to include spectrum in the 5.9 GHz range that would bridge the gap between the U-NII-3 band and the 6 GHz band for unlicensed Wi-Fi use, and work with the Department of Transportation to allow the FCC to determine future development of the 5.9 GHz spectrum band.

Thank you for your consideration of these remarks as you undertake a review of the unlicensed use of the 6 GHz band. Should you have any questions, please contact either me or CAGW Technology and Telecommunications Policy Director Deborah Collier at 202-467-5300.

Sincerely,



² "Innovation," Auto Alliance, <https://autoalliance.org/innovation/>.

³ Citizens Against Government Waste letter to The Honorable Elaine Chao, Secretary, U.S. Department of Transportation, September 7, 2017, <https://www.cagw.org/legislative-affairs/agency-comments/cagw-comments-federal-motor-vehicle-safety-standards-v2v>.

⁴ "Parties Disagree on 5.9 GHz Sharing Issues," National Public Safety Telecommunications Council, July 11, 2016, <https://blog.npstc.org/2016/07/11/parties-disagree-on-5-9-ghz-sharing-issues/>.

⁵ Michael O'Rielly, "Defining Auto Safety of Life in 5.9 GHz," FCC Blog, June 8, 2016, <https://www.fcc.gov/news-events/blog/2016/06/08/defining-auto-safety-life-59-ghz>.

⁶ Connected Vehicle Technology Challenge, Understanding DSRC," DEVPOST, 2011, <https://connectedvehicle.devpost.com/details/understanding-dsrc>.