



March 5, 2018

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VIA ELECTRONIC FILING

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

Re: *Panasonic Corporation of North America, et al., Notice of Ex Parte
Presentation*
ET Docket No. 13-49; GN Docket 17-183

Dear Ms. Dortch:

Per FCC Rule 1.1206, this letter provides notice that on March 2, 2018, representatives of Panasonic Corporation of North America (“Panasonic”),¹ the Safety Spectrum Coalition, and several state departments of transportation (together, the “V2X Parties”) held meetings with advisors to FCC Commissioners and Commission staff as described in Attachment A.

During each meeting, the V2X Parties discussed the importance of protecting all seven channels of 5.9 GHz spectrum for vehicle-to-vehicle (“V2V”), vehicle-to-infrastructure (“V2I”) and vehicle-to-pedestrian (“V2P”) communications (collectively “V2X”). V2X technology dramatically increases roadway safety, with the potential to eliminate 89% of Light Vehicle to Light Vehicle crashes and 85% of their associated economic costs.² As shown in detail below, the state representatives each talked about current and planned deployment of V2X roadway safety technology and how the full allotment of 5.9 GHz spectrum must be preserved for V2X to avoid stranding significant investment.

¹ Newark, N.J.-based Panasonic Corporation of North America is a leading technology partner and integrator to businesses, government agencies and consumers across the region. The company is the principal North American subsidiary of Osaka, Japan-based Panasonic Corporation and leverages its strengths in Immersive Entertainment, Sustainable Energy, Automated Supply Chains and Connected Solutions to provide secure and resilient integrated solutions for B2B customers. Panasonic was highlighted in Forbes Magazine’s Global 2000 ranking as one of the Top Ten Best Regarded Companies for 2017. The ranking is based on outstanding scores for trustworthiness, honesty with the public and superior performance of products and solutions. Learn more about Panasonic’s ideas and innovations at PanasonicMovesUs.com.

² Federal Motor Vehicle Safety Standards; V2V Communications, 82 Fed. Reg. 3854, 3863 (proposed Jan. 12, 2017).

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Specifically, Mike Lewis and Peter Kozinski from the Colorado Department of Transportation (“CDOT”) discussed RoadX, Colorado’s and CDOT’s bold vision and commitment to being a national leader in the partnerships and use of innovative technology for crash-free, injury-free, delay-free travel in Colorado. CDOT is making a \$70 million investment in connected vehicles via its partnership with Panasonic and other partners. These significant public-private partnerships consist of building the nation’s first commercial grade connected vehicle ecosystem that can ingest and return V2X information on both the Dedicated Short-Range Communication (“DSRC”) and cellular platforms. Colorado has so far installed nine roadside units (“RSUs”), with deployment of 245 planned in the next 2.5 years. Within the next four years, CDOT will have more than 500 miles of highways outfitted with RSUs to support V2X activities. Moreover, CDOT has developed and implemented a requirement that as significant improvements are made to our roadways network, the infrastructure needed to support V2X activities is made part and parcel of these projects. In addition, CDOT will outfit 2,000 vehicles with aftermarket onboard units (“OBUs”) and is exploring other public-private partnerships to extend OBU deployment to 10,000 by 2020. CDOT also discussed how local municipalities in Colorado have demonstrated interest in the benefits of V2X technology.

Carlos Braceras from the Utah Department of Transportation (“UDOT”) discussed the Utah Smart Transit Signal Priority project, which utilizes V2X to enable conditional priority of transit vehicles at traffic signals. The project is the first of several connected vehicle projects undertaken by UDOT and is intended to pave the way for other uses of V2V technology for transportation management and highway safety. Low-latency DSRC is particularly important in applications where crashes are being prevented, and it also can provide direct communication for mobility applications. DSRC RSUs have been installed at 24 intersections along an 11-mile section of Redwood Road in Salt Lake County, and DSRC OBUs have been installed on transit buses operated by the Utah Transit Authority. UDOT and the Utah Transit Authority are installing the system on a new bus-rapid transit system in the Provo-Orem area of Utah. On this project, scheduled to complete in August 2018, DSRC RSUs are being installed on 47 signalized intersections and in 25 specialized buses. For instance, UDOT is working to install V2X equipment along several other corridors and on snow plows to facilitate the safer operation of snow removal. This project will continue through early 2019.

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Collin Castle discussed how Michigan Department of Transportation (“MDOT”) has deployed and/or plans to deploy 400 DSRC RSUs prior to the end of 2019 throughout Michigan. Most of these deployments have been focused in Southeast Michigan, including Detroit and surroundings areas. Importantly, MDOT enacted a policy to add DSRC technology at every signal location statewide as it is being modernized. In addition, Oakland County is home to the USDOT Southeast Michigan Connected Vehicle Test Bed, which includes nearly 50 RSUs deployed at intersections throughout the suburban communities of Novi and Farmington Hills. The operations and maintenance of this test bed was transitioned to MDOT in late 2017, and MDOT is currently operating the infrastructure. Moreover, Ann Arbor is home to the Ann Arbor Connected Vehicle Test Environment, which has been expanded to cover the entire 27 square miles of the city and includes DSRC enabled vehicles and infrastructure at 45 intersections and 12 freeway sites. Further, the University of Michigan Transportation Research Institute plans to deploy 1,500 vehicles per year, with a goal of 5,000 vehicles on the road by the end of 2018. Through the numerous partnerships cultivated through Michigan’s initiatives, there are additional deployments focusing on the facilitation of device testing and application development. These partnerships include working closely with vehicle Original Equipment Manufacturers and suppliers to test V2I safety applications using real world DSRC enabled infrastructure.

Tracy Larkin-Thomason from the Nevada Department of Transportation (“NDOT”) discussed numerous initiatives the state and their public partners have initiated in northern and southern Nevada. For instance, there are 18 DSRC units over a more than 30-mile corridor between Reno and Carson City as part of the multiyear Intelligent Mobile Observations project. These units enable real-time mobile weather-related data from snowplows and maintenance vehicles to improve our state’s snow and ice removal efforts. 66 DSRCs have been installed in the Las Vegas area, with 26 more to be installed by late summer 2018. In addition, a fully autonomous driverless shuttle was implemented in November 2017 and is operating within the Innovation District in downtown Las Vegas. Integration of V2X with traffic data and emergency and incident response vehicles has reduced response times by 12-15 minutes on the freeway, which is critical for public safety. As a result, other initiatives with emergency and incident response vehicles are being investigated.

Please contact the undersigned with any questions regarding this letter.



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Respectfully submitted,

A handwritten signature in black ink, appearing to read "Henry Gola".

Henry Gola
Wiley Rein LLP

*Counsel to Panasonic Corporation of
North America*

cc: Julius Knapp
Matthew Hussey
Nicholas Oros
Howard Griboff
Louis Peraertz
Alison Nemeth
Michael Carowitz
Alison Cheperdak
Erin McGrath
Will Adams
Travis Litman

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ATTACHMENT A

Meeting 1

Attendees: Mike Lewis, Executive Director, CDOT, Carlos Braceras, Executive Director, UDOT, Collin Castle, ITS Program Manager, MDOT, Hannah Izon, Safety Spectrum Coalition, Henry Gola, Wiley Rein LLP, counsel to Panasonic.
FCC: Julius Knapp, Chief, Office of Engineering and Technology (“OET”), Matthew Hussey, Associate Chief, OET, Nicholas Oros, Spectrum Policy Branch Chief, OET, Howard Griboff, Special Counsel, OET.

Meeting 2

Attendees: Lewis, Braceras, Castle, Izon, Gola, Tracy Larkin-Thomason, Deputy Director, Southern Nevada, NDOT, Peter Kozinski, Director, RoadX Program, CDOT.
FCC: Louis Peraertz, Senior Legal Advisor, Commissioner Clyburn.

Meeting 3

Attendees: Lewis, Castle, Izon, Gola, Larkin-Thomason, Kozinski.
FCC: Alison Nemeth, Legal Advisor, Chairman Pai, Michael Carowitz, Special Counsel, Chairman Pai, Alison Cheperdak, Law Clerk, Chairman Pai.

Meeting 4

Attendees: Lewis, Castle, Izon, Gola, Larkin-Thomason, Kozinski.
FCC: Erin McGrath, Legal Advisor, Commissioner O’Rielly.

Meeting 5

Attendees: Lewis, Izon, Gola, Larkin-Thomason, Kozinski.
FCC: Will Adams, Legal Advisor, Commissioner Carr.

Meeting 6

Attendees: Lewis, Izon, Gola, Larkin-Thomason, Kozinski.
FCC: Travis Litman, Chief of Staff and Senior Legal Advisor, Commissioner Rosenworcel.