

April 18, 2019
Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th St. SW, Room TW-B204
Washington, DC 20554

Re: 5GAA Petition for Waiver to Allow Deployment of Cellular Vehicle-to-Everything (C-V2X) Technology in the 5.9 GHz Band; GN Docket No. 18-357; Revision of Part 15 of the Commission's Rules; ET Docket No. 13-49

Dear Ms. Dortch:

General Motors submits this letter summarizing an ex parte meeting in the above-referenced docket. On April 17, 2019, General Motors met separately with (1) Erin McGrath, Legal Advisor with the Office of Commissioner O'Rielly, and (2) Bill Davenport with the Office of Commissioner Starks. The following GM individuals participated in the meetings: Maryann Combs, VP Global Vehicle Safety; John Capp, Director Global Safety; Richard Lopez, Director Federal Affairs; Reagan Payne, Manager Emerging Technologies Policy. Melinda Lewis with the Fritts Group joined for the meeting with Erin McGrath.

During each meeting, GM stressed the tremendous potential benefits of V2X in the United States, and that it is critical that the FCC preserve the entire 5.9 GHz safety band for transportation safety. We outlined that GM is committed to a future of zero crashes, zero emissions, and zero congestion. As part of this vision, GM has made significant investments and advances in Vehicle-to-Vehicle (V2V) and Vehicle-to-Everything (V2X) technologies, which have great potential to enhance road safety and save thousands of lives.

We discussed that GM deployed V2V capabilities in the U.S. market, deploying DSRC-based V2V on its Cadillac CTS in 2017. In 2018, GM announced it will build V2X on-board units into a high-volume Cadillac crossover by 2023, and expand the deployment to all Cadillac models thereafter. GM's planned expansion of V2X communications to all Cadillac vehicles underscores the importance of ensuring that automakers have access to spectrum sufficient to

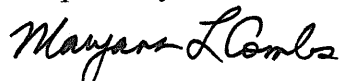
sufficient to support their growing connected vehicle safety needs and certainty that spectrum will remain dedicated to automotive safety.

GM noted that currently, Dedicated Short Range Communications (DSRC) Service—the technology presently used by GM in its vehicles having V2V capability—is the only fully-developed solution. GM has committed to continuing to deploy V2V on its vehicles and to encourage widespread V2X deployment throughout the industry to promote safety. The more vehicles that deploy a common connectivity technology like DSRC, the more crashes that potentially can be avoided and the more lives that can be saved.

Cellular Vehicle to Everything (C-V2X) technology holds promise as a potential alternative technological solution. Accordingly, GM believes C-V2X should be provided temporary access to the upper 20 MHz of the 5.9 GHz band to allow further development and testing to demonstrate whether C-V2X can work effectively in field conditions and at scale. Further, if C-V2X is allowed access to the 5.9 GHz safety band, additional testing should be done to determine if unlicensed WiFi activity could cause harmful interference to C-V2X communications that would differ from those with DSRC communications.

We encouraged the Agency to preserve the entire 5.9 GHz band for transportation safety applications and expressed concern about allowing unlicensed WiFi use in the 5.9 GHz safety spectrum until it is proven that such access does not cause harmful interference to the safety critical vehicle communications. GM highlighted that the company is currently and will continue to use and invest in safety applications in the 5.9 GHz band. GM is committed to continuing to work with industry partners to further deploy lifesaving V2X technologies.

Respectfully Submitted,



Maryann L. Combs
Vice President, Global Vehicle Safety
General Motors
29427 Louis Chevrolet Road
Warren, MI 48093