TOYOTA

James E. Lentz
Chief Executive Officer

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May 18, 2018

The Honorable Michael O'Rielly
Commissioner
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

The Honorable Jessica Rosenworcel
Commissioner
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

Dear Commissioner O'Rielly and Commissioner Rosenworcel:

Thank you for your letter dated May 10, 2018 regarding Toyota's announcement last month to deploy Dedicated Short Range Communications (DSRC) systems on vehicles sold in the United States starting in 2021, with the goal of adoption across most of our automotive lineup by the mid-2020s. We believe this decision represents a significant step forward in creating a safer driving ecosystem and is consistent with our long-standing goal of helping drivers realize a future with zero fatalities from crashes. We know that the Commission shares that goal, and trust that the Commission will preserve the use of spectrum within the 5.850-5.925 GHz band that has long been allocated for that purpose.

The decision by Toyota and Lexus to deploy DSRC in the U.S. is just the latest development in an ongoing and persistent move by automakers, infrastructure owners and operators, and other stakeholders to deploy this proven technology throughout the world. Toyota and Lexus became the world's first automaker to sell and commercialize vehicles equipped with DSRC when we deployed the technology in Japan in 2015. More than 100,000 DSRC-equipped Toyota and Lexus vehicles were on the road as of March 2018. And Volkswagen – the market leader in Europe – recently announced that it will deploy DSRC in Volkswagen Group vehicles there starting in 2019.

Indeed, our April announcement relating to the U.S. market leverages the significant deployments that have already taken place here. As you are aware, starting in 2017, General Motors began deploying DSRC-enabled vehicles in the U.S. There have also been substantial investments by transportation infrastructure owners and operators in Arizona, California, Florida, Michigan, Minnesota, New York, North Carolina, Pennsylvania, Tennessee, Wyoming, and at least a dozen other states in DSRC-enabled infrastructure. The technology is being used to implement a variety of safety critical applications, including Red Light Violation Warnings, Reduced Speed Zone Warnings, Curve Speed Warnings, and Spot Weather Impact Warnings. DSRC has been out of the "testing and conceptual" phases for quite some time.

We have, of course, been closely monitoring developments on the 5.850 – 5.925 GHz proceeding that has been pending since February of 2013 and have engaged regularly with the Commission on this topic. We are fully aware that the Commission is in the first phase of multi-phase testing to evaluate the potential for unlicensed operations in the band without causing harmful interference to DSRC functionality. We are comfortable with our decision to commit capital expenditures to DSRC technology because we are confident that the Commission will implement a sharing mechanism only if that testing fully validates that unlicensed operation can safely occur in the band, and not disrupt the current or further deployment of this important safety technology by existing licensees.

We look forward to continuing to work with you on this important issue.

Sincerely,

James E. Lentz