



**TOYOTA MOTOR NORTH AMERICA, INC.**

WASHINGTON OFFICE  
325 7<sup>th</sup> Street, NW - SUITE 1000, WASHINGTON, DC 20004

TEL: (202) 775-1700  
FAX: (202) 822-0928

**VIA ELECTRONIC DELIVERY**

June 29, 2018

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street SW  
Room TWA325  
Washington, DC 20554  
Re: *Ex Parte*

ET Docket No. 13-49, Revision of Part 15 of the Commission's Rules to Permit Unlicensed  
National Information Infrastructure (U-NII) Devices in the 5 GHz Band

Dear Ms. Dortch:

This is to inform you that on Wednesday, June 27, 2018, Andrew Coetzee and Hilary Cain of Toyota (collectively "Toyota Representatives") met separately with Chairman Ajit Pai and Wireless Advisor Rachael Bender; Commissioner Michael O'Rielly and Legal Advisor, Erin McGrath; and Will Adams, Legal Advisor to Commissioner Brendan Carr. The Toyota Representatives provided background information and insight into Toyota's announcement in April of 2018 that it had decided to deploy Dedicated Short-Range Communications (DSRC) systems on Toyota and Lexus vehicles sold in the United States starting in 2021, with the goal of adoption across most of its lineup by the mid-2020's.

The Toyota Representatives emphasized Toyota's strong commitment to automotive safety, citing its industry leadership in making Automatic Emergency Braking and other active safety features standard on Toyota and Lexus vehicles in the United States. The Toyota Representatives stated that, by helping vehicles identify potential hazards that are beyond the range or capability of sensor technology, DSRC will further help Toyota achieve its goal of reducing crashes.

The Toyota Representatives reiterated that DSRC is a proven, reliable, and mature technology and that deployment of DSRC represents the quickest way to begin realizing the expected safety benefits of vehicle-to-vehicle and vehicle-to-infrastructure communication. The Toyota Representatives also expressed a sense that there was growing interest among most vehicle manufacturers in moving forward with DSRC and noted recent deployment announcements by Toyota, General Motors, and Volkswagen as evidence.

The Toyota Representatives confirmed that potential alternatives to DSRC were not yet ready for deployment. In addition, the Toyota Representatives expressed concerns that the safety benefits of vehicle-to-vehicle and vehicle-to-infrastructure communication would not be fully realized if the market becomes fragmented into multiple, non-interoperable technologies.

The Toyota Representatives explained that Toyota has developed a roadmap of DSRC-enabled safety applications and expects to increase applications in its vehicles over time as features become ready for deployment.

The Toyota Representatives mentioned that although the current proceeding is exploring the possibility of sharing the 5.9 GHz spectrum with unlicensed uses, there has always been an expectation that, as an existing use, DSRC would be protected from harmful interference. As a result, the Toyota Representatives expressed comfort in the decision to deploy DSRC and confidence that the Commission would not take action that would strand technology in the market or force Toyota to delay its deployment plans. The Toyota Representatives also reiterated continued support for the three-phase test plan unveiled by the Commission to help determine whether unlicensed devices can operate in the band without harmful interference to DSRC.

Finally, the Toyota Representatives acknowledged that it would have been easier for Toyota to wait until some of the uncertainties around spectrum, regulatory mandates, and technology alternatives were resolved. However, driven by its commitment to improving safety, Toyota decided to move forward with DSRC deployment.

**/s/Hilary M. Cain**

**Hilary M. Cain**

**TOYOTA**

Director, Technology and Innovation Policy

325 7<sup>th</sup> Street NW, Suite 1000

Washington, DC 20004