



COLORADO
Department of Transportation
Office of the Executive Director
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July 1, 2016

VIA ELECTRONIC DELIVERY

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

Re: 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

To the Commission:

Pursuant to Sections 1.415 and 1.419 of the Commission's Rules (47 C.F.R. §§ 1.415 and 1.419), the Colorado Department of Transportation (CDOT) hereby provides its comments in response to the Commission's Public Notice requesting that interested parties "refresh the record" in the above-captioned proceeding.¹

CDOT opposes any sharing of the 5850-5925 GHz Band (5.9 GHz Band) between Dedicated Short Range Communications ("DSRC") and Unlicensed National Information Infrastructure ("U-NII") devices. There is no doubt that DSRC applications for Vehicle-to-Vehicle ("V2V") and Vehicle-to-Infrastructure ("V2I") wireless communications promise unprecedented and transformative safety benefits for the residents of Colorado. DSRC is also a significant element to the USDOT's plans to move Towards Zero Deaths with estimates suggesting that 80% of crashes could be eliminated through connected vehicle technology, saving many of the 33,000 people who die on our roadways every year.

DSRC is poised for near-term deployment in Colorado and will save hundreds of lives. Though CDOT has not yet applied for a FCC license we are in the process of planning for the deployment of \$10 million Connected Vehicles Project on the I-70 Mountain Corridor of Colorado. DSRC communications in the 5.9 GHz Band is a major component to those plans.

CDOT urges the Commission to give state DOTs time to deploy the needed technologies and not lose sight of how we can save lives with this technology as well as potentially transform mobility on our roads. In addition to being opposed to the sharing of the 5.9 GHz Band, CDOT is also opposed to both the Cisco and Qualcomm proposed sharing proposals for U-NII operations in the 5.9 GHz Band. Again, saving lives is the "highest and best use" of spectrum resources. Sharing of the Band has the potential to undermine the safety benefits we hope to achieve.

Sincerely,

Shailen P. Bhatt
Executive Director

¹ See Public Notice, "The Commission Seeks to Update and Refresh the Record in the 'Unlicensed National Information Infrastructure (U-NII) Devices in the 5 GHz Band' Proceeding," ET Docket No. 13-49, FCC 16 68 (rel. June 1, 2016) ("Public Notice").

