RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF TRANSPORTATION
LANSING

KIRK T. STEUDLE
DIRECTOR

July 6, 2016

The Honorable Thomas Wheeler, Chairman
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Dear Chairman Wheeler:

Thank you for the opportunity to respond to Public Notice FCC 16-68 released on June 1, 2016, (ET Docket 13-49), inviting interested parties to update and refresh the record on the status of potential spectrum sharing solutions between proposed Unlicensed National Information Infrastructure (U-NII) devices and Dedicated Short Range Communications (DSRC) operations in the 5.850-5.925 GHz (U-NII-4) band.

DSRC, as part of the 5.9 GHz band, has the potential to address "80 percent of the crash scenarios involving non-impaired drivers." The Michigan Department of Transportation (MDOT) believes this technology to be a core component of our program to reduce the nearly 1,000 members of the motoring public killed on Michigan roadways every year.

Michigan is currently host to arguably the largest deployment of operating DSRC roadside units in the country. There are approximately 130 DSRC roadside units operated by MDOT, the United States DOT, and our local partners (the Road Commission for Oakland County and University of Michigan). To date, over $30 million has been invested in this technology by our public sector partners in Michigan, with a plan for an additional $40 million over the next five years. These deployments will run safety-critical applications where the uninterrupted low-latency DSRC band is critical, such as Red Light Violation Warning, Work Zone/Lane Reduction Warning, and Spot Road Weather Warnings. In conjunction with automobile companies located in Michigan, we are working on expanding the use of these applications throughout Michigan this fall. For these life-saving applications to be successful, uninterrupted communication without interference is critical.

With any potential spectrum sharing solution, we would request assurance that DSRC transmissions on our existing and proposed time-critical safety applications are uninterrupted, with no signal interference from other equipment operating on the same or adjacent bands. Without this assurance, our existing and planned Connected Vehicle System and our ability to provide the public with a safe transportation network is in jeopardy; any scenario requiring a significant retesting, redeployment, or replacement of our DSRC technology will be detrimental to MDOT's goals of reducing traffic fatalities, and would have a significant negative impact to the state's limited financial resources.

We respectfully ask the Commission to allow for due diligence on this critical issue by ensuring that any spectrum sharing scenario will ensure there would be no interruption or signal interference with the existing and proposed safety critical DSRC-based connected vehicle applications.

We stand ready to work with the National Telecommunications and Information Administration, the wireless industry, and other federal and non-federal stakeholders to evaluate the feasibility of existing, modified, proposed, and new spectrum sharing technologies and approaches. However, this process should be allowed to proceed without a predetermination by the FCC that spectrum sharing in the 5.9 GHz should be the ultimate outcome.

We support efforts to identify spectrum that may be utilized to expand Wi-Fi applications. However, with over 30,000 deaths on our nation's roads every year, and nearly 1,000 of them in Michigan, we also believe it is critical that efforts to open up additional spectrum do not come at the expense of revolutionary life-saving technologies.

Thank you for your consideration and we look forward to working with you on this critical issue. If you have any questions regarding our comments, please contact either me or Matt Smith, ITS Program Administrator, at 248-361-2470.

Sincerely,

Kirk T. Steudle
Director

BFS:OFS:MSG:MS:drc

cc: M. Van Port Fleet
R. Van Portfliet
M. Chaput
M. Geib
M. Smith
Executive File