Public Affairs

July 22, 2016

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

Re: ET Docket No. 13-49: Refresh the Record on Unlicensed National Information Infrastructure (U-NII) Devices in the5GHz Band

Dear Ms. Dortch:

We appreciate the opportunity to submit reply comments in response to the Federal Communications Commission's Public Notice dated June 1, 2016 (FCC 16-68) (the "PN") to update and refresh the record on the use of U-NII devices in and near the 5.9 GHz band designated for Dedicated Short Range Communications (DSRC).

AAA is a not-for-profit federation of motor clubs serving more than 56 million members in the U.S. and Canada. Throughout more than 100 years of public service, the association has worked with federal and state policymakers and industry stakeholders to promote sound public policy positions that improve all aspects of the driving environment and ensure emerging vehicle technologies and equipment promote driver safety. AAA recognizes the great potential for innovation and safety benefits with the development and deployment of connected vehicle technology and semi- and fully-autonomous vehicles, from dramatic reductions in crash-related injuries and fatalities to significant increases in convenience and mobility.

With new estimates from the National Highway Traffic Safety Administration showing a 7.7 percent increase in traffic deaths in 2015 over 2014, the importance of applying innovative technologies to improve safety cannot be overstated. The estimated 35,200 traffic deaths in 2015 is the highest number of people killed on U.S. roads since 2008, and represents the highest annual percentage increase since 1966.

AAA urges the Commission to preserve the 5.9 GHz band and its channelization as designed for DSRC safety of life benefits and mobility applications, which have been in development for more than a decade. It is essential that any sharing protocol being considered does not undermine or interfere with currently deployed and planned deployments of DSRC applications, and thorough testing must be done to determine that the protocol is safe before any sharing protocol is implemented.

DSRC is an essential and unique technology for safety of life Vehicle-to-Vehicle (V2V), Vehicle-to-Infrastructure (V2I) and Vehicle-to-Pedestrian (V2P) communications.

Connected cars have tremendous potential to enhance safety, improve efficiency and deliver an improved motoring experience for drivers by enabling vehicles to communicate with each other and the infrastructure around them. Based on a significant amount of research and field testing by NHTSA, AAA is encouraged by estimates that V2V and V2I communication has the potential to prevent or reduce the impact of some 80 percent of all unimpaired crashes by allowing vehicles to talk to each other using DSRC. A range of crash prevention technologies integrated with connectivity communications—including intersection assistance, left-turn assistance and "do-not-pass" warning systems—can also help to improve safety on our roads and reduce the number of crashes in the coming years.

In order to promote this important goal of safety improvement, AAA has supported NHTSA's plans to establish a new Federal Motor Vehicle Safety Standard that will require all new vehicles to be equipped with DSRC technology. NHTSA's notice of proposed rulemaking is currently under consideration by the Office of Management and Budget.

The first passenger vehicle deployments will begin this year with tens of thousands of DSRC-equipped vehicles arriving on the roadways. In addition, the ability to retrofit DSRC devices on older vehicles in the fleet will greatly increase the technologies' penetration rate. Moreover, DSRC-enabled vehicles will support V2I and V2P applications which offer even further safety benefits.

DSRC is being deployed this year after years of expensive, rigorous research, development and testing to ensure safety.

DSRC technology has moved from research and testing to initial deployments. The auto industry and the Department of Transportation have conducted extensive research showing the significant safety benefits of V2V. Through various testing regimes, standard-setting efforts and large-scale pilots, they have also established the best ways for vehicles on the road to exchange and impart information, and the best way for V2V to operate in the field.

Any spectrum sharing must be proven to be completely and reliably safe without interference to the safety of life functions of DSRC. The FCC should adopt a reasonable testing schedule that emphasizes safety, not speed.

We support the sharing of the 5.9 GHz band as long as it can be positively proven that any unlicensed sharing of the band will not impede the safety of life functions of DSRC.

The burden of proof for safe sharing should rest with those who advocate for it. The FCC should adopt a reasonable schedule of testing that is based on what is required to show empirically that sharing the spectrum can be done safely.

The FCC's chartered purpose is for "promoting safety of life and property through the use of wire and radio communication."[1]

We recognize the FCC's goal of finding and devoting more spectrum for Wi-Fi and unlicensed use, but the Commission also needs to stay true to its statutory purpose as set forth in the Communications Act of 1934, which created the Commission "for the purpose of promoting safety of life and property through

[1] 47 U.S.C. §151.

the use of wire and radio communication."[2] The Commission should not put safety of life on an equal footing with the myriad uses to which Americans put Wi-Fi, nearly all of which do not affect safety of life. We respectfully ask the FCC to approach the record in this proceeding as a matter of public safety.

Respectfully,

Jill Ingrassia
Managing Director
AAA Government Relations and Traffic Safety Advocacy

[2] *Id.*