



August 22, 2018

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

Subject: 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 Secretary Dortch:

As the national representative of the trucking industry, ATA has a strong interest in highway safety for all motorists. Highways are the motor carriers' and drivers' workplace. Employing more than 7.3 million people and moving 10.5 billion tons of freight annually, trucking is the industry most responsible for moving America's economy. The trucking industry moves 70.1 percent of our nation's domestic surface freight and is a critical player in the safety of our nation's roadways, spending \$9.5 billion per year on safety training, technology, equipment, and management.

ATA was pleased to see Toyota's April 16, 2018 announcement of the company's plans to begin deploying Dedicated Short-Range Communication (DSRC) devices on their vehicles beginning in 2021, which will enable vehicle-to-vehicle (V2V) and vehicle-to-infrastructure (V2I) communications – collectively known as V2X.

Much work has been done by federal government, state governments, research institutions, technical standards organizations, technology companies and automakers to develop DSRC based V2V protocols and applications for passenger vehicles. ATA is supportive of V2V technology and the significant safety benefits it is expected to provide. NHTSA has estimated that just four DSRC-based V2V applications could avoid or mitigate 89 percent of light duty vehicle crashes¹, and this will have benefits for all road users. While NHTSA is currently conducting research on V2V for heavy vehicles as well, the agency estimates that 70 percent of crashes involving trucks occurred in scenarios that could potentially be addressed by V2V systems.²

ATA believes that the 5.9GHz DSRC spectrum is critical for the successful deployment of V2V. There is no other technology available today that has demonstrated the capability to perform adequately in the V2V environment. ATA supports the need to maintain a dedicated bandwidth, free from harmful interference, on the 75 MHz within the 5.9GHz frequency spectrum for V2V and other V2X applications.

Maintaining the full breadth of seven channels in the 5.9GHz spectrum for DSRC is essential towards enabling a wide deployment for V2X that accommodates all vehicle types, road users and infrastructure operators thereby fostering the innovation in V2X applications that will facilitate the safe and efficient movement of people and goods. In fact, this innovation is already occurring with the application of driver-assistive truck platooning enabled by DSRC technology, which improves fuel efficiency, provides safety benefits, and stimulates greater business efficiency in trucking. Truck platooning systems, which have been successfully demonstrated on U.S. roads by a number of manufacturers as well as the Federal Highway Administration³, use V2V communication to

¹ See 82 Federal Register 3863.

² Chang, J. (2016, July). Summary of NHTSA heavy-vehicle vehicle-to-vehicle safety communications research. (Report No. DOT HS 812 300). Washington, DC: National Highway Traffic Safety Administration.

³ <https://www.fhwa.dot.gov/pressroom/fhwa1713.cfm>

connect the active safety systems, braking and acceleration between trucks. This V2V link, which takes place on DSRC channels separate from those reserved for other uses, provides a robust, near-instantaneous connection, allowing a lead and following trucks to share the benefits of active safety systems and synchronization of their acceleration and braking. This allows the trucks to react significantly faster than a human or even radar sensors could on their own, thereby suggesting safety improvements beyond average trucks on the road today.

With the development of innovative applications like truck platooning, and the deployment of vehicles and roadside infrastructure with DSRC for V2X communications as noted by other commenters to this docket (Toyota, Michigan DOT, NXP Semiconductors), it is important that the FCC not only ensure that the 5.9 GHz band remain free from harmful interference, but also that any rules changes to allow sharing in this band must not disrupt the current deployments and innovations that are occurring under existing FCC rules.

Sincerely,

A handwritten signature in black ink that reads "Michael Cammisa". The signature is fluid and cursive, with a long, sweeping underline.

Michael Cammisa
Vice President
Safety Policy, Connectivity & Technology