

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
)	
Petition for Emergency Relief)	GN Docket 21-304
Due to COVID-Related Delays in)	
3G Sunset Transition for Central)	
Station Alarm Subscribers)	
)	

**THE ALLIANCE FOR AUTOMOTIVE INNOVATION COMMENTS
IN SUPPORT OF THE ALARM INDUSTRY COMMUNICATION COMMITTEE’S
PETITION FOR EMERGENCY RELIEF**

The Alliance for Automotive Innovation (“Auto Innovators”) hereby submits the following comments in response to the Alarm Industry Communications Committee’s (“AICC”) Petition for Emergency Relief (“Petition”). Extending the 3G network sunset will not only assist AICC in ensuring that millions of homes and businesses remain protected but will also provide automakers with the additional time required to manage or otherwise mitigate the impact on vehicle owners, drivers, and passengers with connected vehicle services that currently rely on 3G networks.

Auto Innovators is the singular, authoritative, and respected voice of the automotive industry. Focused on creating a safe and transformative path for personal mobility, Auto Innovators represents the manufacturers that produce nearly 99 percent of cars and light trucks sold in the United States. Members of Auto Innovators include motor vehicle manufacturers, original equipment suppliers, technology companies, and others within the automotive ecosystem. The auto industry is the nation’s largest manufacturing sector and contributes \$1.1 trillion to the

U.S. economy and represents 5.5 percent of the country's GDP. As a significant engine for our nation's economy, the auto sector is responsible for 10.3 million jobs and \$650 billion in paychecks.

In its Petition, AICC has clearly demonstrated the harmful impact that a February 22, 2022, sunset of 3G networks will have on millions of people and businesses with central station alarm security protection systems that currently depend on these networks. The AICC has also persuasively established that the COVID-19 pandemic and the ongoing microchip shortage have caused significant delays in the ability of alarm carriers and manufacturers to replace 3G alarm signaling radios. Auto Innovators agrees with AICC that directing AT&T to temporarily delay its 3G sunset is an appropriate response by the Commission to these unprecedented challenges.

The impending sunset of 3G networks has potentially significant impacts for vehicles in the U.S. market. Modern vehicles are increasingly outfitted with cellular-based technology that enables connected vehicle services that provide important safety and other support to drivers and passengers. Connected vehicle services include automatic collision notification and other emergency response services, roadside assistance, navigation and real-time traffic information, and vehicle status and diagnostics information. While automakers are integrating 4G- and 5G-based capabilities to support these connected features in their newest production vehicles, older vehicles that are still owned and driven by people throughout the U.S. rely on 3G networks.¹ According to the Bureau of Transportation Statistics, the average age of a vehicle in the U.S. is

¹ As an example of the impact, Jaguar Land Rover (which accounts for just under 1% of the US market) has approximately 260,000 vehicles in the U.S. market that are impacted by the 3G sunset.

nearly 12 years.² This means that a fair number of vehicles on the road today were manufactured and sold either before or while 4G networks were first being deployed in this country.

As the Commission well knows, the auto industry was significantly impacted by the COVID pandemic and continues to be especially hard hit by the microchip shortage. As a result, the industry has been constrained in its ability to address or mitigate the impact of the 3G sunset. A modest extension of the 3G sunset to December 31, 2022, will provide automakers with the additional time needed to effectively manage the transition.

As AICC notes in its Petition, previous network transitions were accompanied by longer transition periods. A five-year transition was provided with the sunset of analog cellular service and a four-year transition was provided with the 2G network sunset. Certainly, due to the significant number of vehicles in the U.S. market that today rely on 3G networks as compared to vehicles that in the past relied on 2G networks, a three-year sunset for the 3G network was on its own challenging. However, since nearly half of the transition time has occurred over the course of the COVID pandemic, the expedited transition has been made that much more difficult.

Auto Innovators strongly supports the transition to 5G and is excited about the opportunity that 5G presents for new and innovative connected services for vehicles to support drivers and passengers. However, Auto Innovators agrees with AICC that the 3G sunset must be implemented in a way that will not endanger or unfairly impact customers, including those with older vehicles that currently rely on 3G network-based services. We share the perspective of AICC that an

² "Average Age of Automobiles and Trucks in Operation in the United States," Bureau of Transportation Statistics, <https://www.bts.gov/content/average-age-automobiles-and-trucks-operation-united-states>

extension of the 3G networks through December 31, 2022, should not unduly impede AT&T's 5G rollout.

To this end, Auto Innovators respectfully requests that the Commission grant AICC's request for emergency relief.

Respectfully submitted,

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