

November 20, 2018

The Honorable Ajit Pai
Chairman
Federal Communications Commission
445 12th Street, SE
Washington DC, 20554

RE: ET Docket No. 13-49

Dear Chairman Pai:

The Maryland Department of Transportation (MDOT) submits this letter to respectfully convey its views on repurposing the 5.9 Ghz Dedicated Short Range Communications (DSRC) allocation reserved for transportation safety services. We urge the Federal Communications Commission (FCC) to end the uncertainty regarding the availability of the full 5.9 Ghz DSRC allocation and ensure its preservation for transportation safety applications.

Over a decade ago, the FCC wisely allocated the 5.9 Ghz band for DSRC purposes and established interoperability standards for automobile safety. A fully integrated automated and connected community with vehicle-to-vehicle (V2V) and vehicle-to-infrastructure (V2I) technology will increase situational awareness by enabling all vehicles in the fleet to communicate with each other and the infrastructure on public roads, thereby greatly improving safety and smoothing traffic flow.

The National Highway Traffic Safety Administration (NHTSA) estimates that safety applications enabled by V2V and V2I technology could eliminate or mitigate the severity of up to 80 percent of non-impaired driver crashes. Sadly, there were 37,133 deaths on U.S. roadways last year. Preserving the 5.9 Ghz DSRC allocation, known as "Safety Spectrum", will allow states to continue to invest in the necessary infrastructure to enable the deployment and effective utilization of this critical technology necessary to reduce crashes, prevent injuries, and save lives.

In addition to minimizing accidents, the intelligent management techniques that will result from the technology that is dependent on the full 5.9 Ghz DSRC allocation will greatly ease traffic congestion, reducing associated economic and environmental costs. The statewide cost of congestion based on auto delay, truck delay, and wasted fuel and increased emissions was a staggering \$2.11 billion in 2016, and it continues to grow. This cost is unacceptable.

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The State of Maryland is at the forefront of adopting the foundational technology critical to the deployment of V2V and V2I and the full band of spectrum is needed to allow these safety applications to achieve their great potential. Preserving the entire 5.9 Ghz DSRC allocation will allow these technologies to progress and provide states with the necessary means to protect travelers on public roads and promote transportation efficiencies. We urge you to prioritize automotive and public safety first and reject any petition to repurpose "Safety Spectrum" for unlicensed uses. We would be willing to answer any questions or discuss this issue from a State Transportation Agency perspective.

If you have any additional questions, you may contact Mr. Jeffrey Stockdale, MDOT OGA at 410-865-1096 or jstockdale@mdot.state.md.us. Mr. Stockdale will be happy to assist you.

Sincerely,



R. Earl Lewis
Deputy Secretary

cc: Mr. Tom Curtin, State Legislative Officer, MDOT OGA
Mr. Joseph Saga, Director, Office of CHART & ITS Development, MDOT SHA
Mr. Jeffrey Stockdale, Federal Legislative Officer, MDOT OGA
Mr. Jeff Tosi, Director, MDOT OGA