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Federal Communications Commission
Washington, DC

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Full Title: Office of Engineering and Technology Requests Comment on Phase I Testing of Prototype U-NII-4 Devices

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DA/FCC #: DA-18-1111

Docket/RM: 13-49

Dear Sir or Madam -

The Institute of Transportation Engineers (ITE) is pleased to provide comments to the FCC regarding Docket 13-49, DSRC Phase I Testing of Prototype U-NII-4 Devices.

ITE is an international membership association of transportation professionals who work to improve mobility and safety for all transportation system users and help build smart and livable communities. Founded in 1930, ITE is a community of more than 15,000 transportation professionals, including transportation engineers, transportation planners, consultants, educators, technologists, and researchers, who network through meetings, seminars, and publications.

ITE believes strongly that the development of solutions and technology such as connected and automated vehicles (CAVs) are an important element in achieving “Vision Zero” — an international movement to end fatalities on our roadways. In order to achieve that goal, we strongly urge the Commission to uphold the current order reserving the entire 5.9GHz band for transportation safety purposes.

The results of your Phase 1 testing show that spectrum sharing might be technically feasible, but the original test plan set out a three-phased approach, and we strongly encourage the FCC to follow-through on its commitment. The public release of these results included recognition by the FCC that there have been a number of developments since the original test plan was announced, which is all the more reason to continue with your planned approach.

Institute of Transportation Engineers

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ITE believes that continued testing is the best way to ensure that Wi-Fi unlicensed devices do not interfere with the ability of connected vehicle technology to save lives. Until you have fully examined and rigorously evaluated all viable proposed approaches we support protecting the 5.9GHz band for transportation safety applications.

As pointed out in a recent joint statement by the Intelligent Transportation Society of America, the Alliance of Automobile Manufacturers, Global Automakers, the 5G Automotive Association, and the American Association of State Highway Officials, we are “on the cusp of a major breakthrough in vehicle connectivity and safety innovation.” Millions of dollars have already been invested in this effort, including incorporating connected vehicle technology into the infrastructure.

We support protecting the entire 5.9GHz band for transportation safety applications until such time that further testing proves - beyond any doubt - that safe, reliable, and fool-proof unlicensed sharing can be achieved without potentially interfering with the opportunity to reduce the tragic deaths on US roadways.

Sincerely yours,

A handwritten signature in dark ink, appearing to read 'MS', is positioned above the printed name.

Michael Sanderson
International President

Institute of Transportation Engineers

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