

December 20, 2017

Scott D. Delacourt  
202.719.7561  
SDelacourt@wileyrein.com

**VIA ELECTRONIC FILING**

Marlene H. Dortch  
Federal Communications Commission  
Office of the Secretary  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

Re: *Panasonic Corporation of North America and Colorado Dept. of  
Transportation Notice of Ex Parte Presentations*  
ET Docket No. 13-49; GN Docket 17-183

Dear Ms. Dortch:

Pursuant to Section 1.1206 of the Federal Communications Commission's ("FCC" or "Commission") rules, this letter provides notice that on December 18 and 19, 2017, representatives of Panasonic Corporation of North America ("Panasonic")<sup>1</sup> and the Colorado Department of Transportation ("CDOT")<sup>2</sup> held five meetings with legal advisors to FCC Commissioners and Commission staff as described in Attachment A.

During each meeting, Panasonic and CDOT discussed their strong support for the widespread deployment of connected vehicle technology for vehicle-to-vehicle ("V2V"), vehicle-to-infrastructure ("V2I") and vehicle-to-pedestrian ("V2P") communications (collectively "V2X") to improve transportation safety by helping to avoid crashes, optimize traffic flow, and reduce congestion.

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<sup>1</sup> Newark, N.J.-based Panasonic Corporation of North America is a leading technology partner and integrator to businesses, government agencies and consumers across the region. The company is the principal North American subsidiary of Osaka, Japan-based Panasonic Corporation and leverages its strengths in Immersive Entertainment, Sustainable Energy, Automated Supply Chains and Connected Solutions to provide secure and resilient integrated solutions for B2B customers. Panasonic was highlighted in Forbes Magazine's Global 2000 ranking as one of the Top Ten Best Regarded Companies for 2017. The ranking is based on outstanding scores for trustworthiness, honesty with the public and superior performance of products and solutions. Learn more about Panasonic's ideas and innovations at [PanasonicMovesUs.com](http://PanasonicMovesUs.com).

<sup>2</sup> The Colorado Department of Transportation exists to ensure that Colorado has a safe and efficient highway system by building and maintaining interstates, U.S. highways and state highways. RoadX is Colorado's and CDOT's bold vision and commitment to being a national leader in the partnerships and use of innovative technology for crash-free, injury-free, delay-free travel in Colorado. To learn more about this rapid, fast-paced venture to transform our aging transportation system, visit <https://www.codot.gov/programs/roadx>.

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Panasonic indicated that its strategic decision to partner with CDOT in V2X infrastructure projects was a reflection of the meaningful scale of CDOT's RoadX Program deployment and its potential to be a leading model for other statewide deployments. As CDOT explained, it has made a \$70 million investment to deploy DSRC not only along the 1-70 corridor – a deployment covering more than 90 road miles – but also to include V2X in all planned new highway construction, a commitment which will cover an additional 300-400 road miles. As the parties explained, Colorado is not alone in its desire to deploy at this scale. The parties are working with other states looking to make similar commitments.<sup>3</sup>

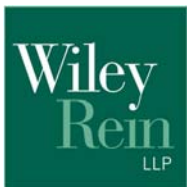
The parties indicated that the success of ongoing deployments of V2X requires the Commission to ensure that the 5.9 GHz safety spectrum remains protected from harmful interference. While Panasonic supports efforts by the FCC and the U.S. Department of Transportation ("DOT") to evaluate spectrum sharing in the band, it firmly believes that any potential sharing plan should protect V2X communications and clearly demonstrate that there is no adverse impact to safety. The parties advocated that the FCC should not consider any sharing arrangements that would degrade V2X communications in the 5.9 GHz band or require re-channelization that would delay implementation of V2X technology and its associated safety benefits. Panasonic stressed that V2X in the 5.9 GHz safety spectrum will play a critical role as an enabler of future mobility, and that interference testing in real-world roadway environments (as envisioned by the FCC and DOT joint test plan for phases two and three) was important to avoid harmful interference that would impact safety applications.<sup>4</sup>

In addition, the parties emphasized that Dedicated Short Range Communications ("DSRC") provides a key foundation for interoperability of V2X messages, and a pathway for deployment of other RF technologies, such as LTE-V2X and 5G-V2X. All of those auto safety technologies require the low-latency 5.9 GHz band for successful deployment. As automated driving systems continue to advance,

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<sup>3</sup> See Attachment B.

<sup>4</sup> See *The Commission Seeks to Update and Refresh the Record in the "Unlicensed National Information Infrastructure (U-NII) Devices in the 5 GHz Band" Proceeding*, Public Notice, 31 FCC Rcd 6130, at 10 (2016). Panasonic agrees with the comments of the Alliance of Automotive Manufacturers that "[t]he FCC should also consider requiring real-world testing to determine the impact of the unlicensed devices on adjacent band V2X systems." Comments of the Alliance of Automotive Manufacturers, GN Docket No. 17-183 (Oct. 2, 2017).



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combining them with connected-vehicle technologies holds the potential to dramatically reduce traffic fatalities and injuries and to improve throughput on existing roads.

Please contact the undersigned with any questions regarding this letter.

Respectfully submitted,

/s/ Scott D. Delacourt

Scott D. Delacourt  
Wiley Rein LLP

*Counsel to Panasonic Corporation of  
North America*



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## **ATTACHMENT A**

**Representatives from Panasonic and CDOT:** Jarrett Wendt (Panasonic), Chris Armstrong (Panasonic), Ryo Takahashi (Panasonic), Peter Kozinski (CDOT), Michael Stelts (Panasonic), Paul Schomburg (Panasonic), Scott D. Delacourt (Wiley Rein LLP, counsel to Panasonic).

### **Meeting 1 (12/18)**

**FCC:** Erin McGrath, Legal Advisor, Wireless, Public Safety and International to Commissioner Michael O’Rielly.

### **Meeting 2 (12/18)**

**FCC:** Nicholas Degani, Senior Counsel to Chairman Ajit Pai and Rachael Bender, Wireless and International Advisor to Chairman Ajit Pai.

### **Meeting 3 (12/19)**

**FCC:** Travis Litman, Chief of Staff and Senior Legal Advisor, Wireline and Public Safety to Commissioner Jessica Rosenworcel.

### **Meeting 4 (12/19)**

**FCC:** Louis Peraertz, Senior Legal Advisor, Wireless, International, and Public Safety to Commissioner Mignon Clyburn.

### **Meeting 5 (12/19)**

**FCC:** Howard Griboff, Special Counsel, Office of Engineering and Technology (“OET”) (by phone), Aalok Mehta, Senior Policy Advisor, WTB, Charles Eberle, Legal Advisor, WTB, Matthew Hussey, Associate Chief (Legal), OET, Jamison Prime, Chief, Policy and Rules Division, OET, Rashmi Doshi, Chief, Laboratory Division, OET (by phone), Scot Stone, Deputy Chief, Mobility Division, WTB, Tim Maguire, WTB, Brian Butler, OET, and Pramesh Jobanputra, WTB.

## Connected Vehicle Deployment Locations



\*Planned deployments in 2017

Source: Volpe - The National Transportation Systems Center (USDOT)

Number of Vehicles: 72,556  
Number of Devices (V2V and V2I): 65,665