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WASHINGTON, DC 20554

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ON AMENDMENTS OF PARTS 2 AND 90 OF THE COMMISSION'S  
RULES TO ALLOCATE THE 5.850-5.925 GHZ BAND TO THE  
MOBILE SERVICE FOR DEDICATED SHORT RANGE  
COMMUNICATIONS OF INTELLIGENT TRANSPORTATION  
SERVICES, ET DOCKET NO. 98-95, ROOM 9096

COMMENTS OF THE

**INTERNATIONAL BRIDGE, TUNNEL &  
TURNPIKE ASSOCIATION**  
2120 L STREET NW SUITE 305  
WASHINGTON DC 20037

21 September, 1998

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## SUMMARY

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IBTTA submits these comments in support of the petition for rule making filed 5/19/97 by the Intelligent Transportation Society of America (ITS America) seeking an allocation of 75 MHz of spectrum in the 5.850-5.925 GHz band for use by intelligent transportation systems. The securing of this frequency with respect to electronic tolling and traffic management would represent an accomplishment for the industry for the future.

This support is provided on condition that IBTTA member agencies and others with dedicated short-range communication systems (DSRC) and services utilized for electronic toll collection (ETC) do not involuntarily relinquish the current frequencies over which they are operating. Toll agencies should have preserved the freedom to exploit present systems to their fullest, both in terms of amortization of current investments and useful life of legacy systems.

IBTTA supports the FCC's position with regard to spectrum sharing, compatibility and efficiency, which is to rely on market forces and existing standards-setting activities to lead the way to a consensus on DSRC standards that will permit nationwide interoperability for selected DSRC operations.

## BACKGROUND

IBTTA is the not-for-profit trade association representing the worldwide toll industry. Our members operate more than 250 facilities in 25 countries, carrying more than 8 billion vehicles each year.

Our US representation consists of more than 50 authorities operating 125 toll roads, bridges or tunnels. These facilities represent more than 4300 miles of roadway, serving some 3.29 billion vehicles, which traveled over 41 million miles on their facilities. Toll facilities are acknowledged as early leaders in the use of ITS through their deployment of DSRC devices in support of ETC. The first installations of these technologies occurred in Texas in 1988. Since then, the number has grown significantly as greater numbers of agencies adopt these technologies or plan to do so in the near future.

IBTTA supports toll financing as an effective alternative or supplement to traditional means of financing transportation infrastructure. Enactment of the Intermodal Surface Transportation Efficiency Act (ISTEA) and the Transportation Equity Act for the 21<sup>st</sup> Century recognized the important contributions toll financing and highway technology make

to improved regional and national mobility and productivity. Toll agencies require adequate radio spectrum to continue to keep on achieving these important objectives.

## **CONCERN: MAINTAIN FLEXIBILITY**

IBTTA has expressed previously and does so now the concern that the adoption of changes proposed in the NPRM may disrupt ITS and ETC research and development by:

- promoting exclusivity while limiting available bandwidth for ITS applications;
- downgrading ETC user status due to the possibility of interference;
- jeopardizing significant public investments in ETC systems; and
- delaying pending deployment of systems.

IBTTA urges the commission to maintain the flexibility necessary for users to make cost-effective, performance-based choices from among a variety of existing automobile vehicle monitoring technologies.

Forced relocation of applications to another frequency before they are ready to be replaced does not preserve flexibility. Many ETC systems can and do operate very successfully in other portions of the spectrum and a rule requiring agencies to desert bandwidth would pose a hardship. No agency should be forced by government mandate to re-configure existing systems in order to accommodate other commercial applications.

## **CONCLUSION**

IBTTA appreciates the interest of the commission in the effort to secure necessary frequency range for current and future DSRC services. We urge the Commission to now complete this process in an expeditious manner. Substantial resources have been invested in ETC and other ITS uses by toll authorities, public agencies and the private sector. Many are based on current technologies and interim rules. It is thus imperative that proposed changes to these rules be resolved, or else the industry will have fewer incentives to commit the needed financial and staff resources to bring these systems to the motoring public.

Respectfully submitted,



Tim McGuckin, Director  
Technology Programs

IBTTA

2120 L Street, NW Suite 305

Washington, DC 20037

202-659-4620 fax: 0500