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American Association of
State Highway and
Transportation Officials

E. Dean Carlson, President
Secretary
Kansas Department
of Transportation

John Horsley
Executive Director

May 30, 2001

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Office of the Secretary
Federal Communications Commission
445 Twelfth Street, S.W., TW-A325
Washington, D.C. 20554

RE: Service Rules for the 5.850-5.925 GHz Band and Revisions to Part 90 of the Commission's Rules (DA 01-1047, WT Docket No. 01-90)

Dear Sir or Madam:

Enclosed are an original and nine copies of AASHTO's Reply Comments concerning Service Rules for the 5.850-5.925 GHz Band and Revisions to Part 90 of the Commission's Rules.

Do not hesitate to inform me if you have further comments or questions regarding this submittal.

Yours truly,

John Horsley
Executive Director

cc: Jan Edwards

No. of Copies rec'd 0+9
List A B C D E

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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington D.C. 20554

In the Matter of	)	
	)	
Service Rules for the 5.85-5.925 GHz	)	WT Docket No. 01-90
Band, and Revisions to Part 90 of the	)	
Commission's Rules	)	

STATUS REPORT ON LICENSING AND SERVICE ISSUES AND DEPLOYMENT STRATEGIES FOR DSRC-BASED INTELLIGENT TRANSPORTATION SERVICES IN THE 5.850-5.925 GHz Band

REPLY COMMENTS OF THE AMERICAN ASSOCIATION OF STATE HIGHWAY AND TRANSPORTATION OFFICIALS

May 30, 2001

Executive Office: 444 N. Capitol St., N.W., Suite 249, Washington, D.C. 20001
Telephone (202) 624-5800 Telefax (202) 624-5806 www.aashto.org

Working To Connect America

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STATUS REPORT ON
LICENSING AND SERVICE ISSUES AND DEPLOYMENT
STRATEGIES FOR DSRC-BASED INTELLIGENT
TRANSPORTATION SERVICES IN THE 5.850-5.925 GHz Band

Reply Comments of:

The American Association of State Highway and Transportation Officials

To: The Commission

AASHTO is the national association of the state departments of transportation officials for the 50 states, the District of Columbia and Puerto Rico. Affiliate and Associate members include City, County and other transportation authorities. Its scope includes all five major transportation modes, and its major purpose is to foster the development, operation and maintenance of an integrated national transportation system.

AASHTO, through its Special Committee on Wireless Technology has been active in matters related to wireless telecommunications system design, construction and operations for more than 50 years. AASHTO is a member of the Intelligent Transportation Society of America with membership in many ITSA committees including the telecommunications committee.

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Background Information

On October 22, 1999 the Commission issued a Report and Order allocating 75 MHz of spectrum in the 5.850-5.925 MHz band to the mobile service for use by Dedicated Short-Range Communications (DSRC) systems. The DSRC service is defined as: the use of non-voice radio techniques to transfer data over short distances between roadside and mobile radio units, between mobile units, and between portable and mobile units to perform operations related to the improvement of traffic flow, traffic safety, and other intelligent transportation service applications, in a variety of public safety and other intelligent transportation service applications, in a variety of public and commercial environments. DSRC systems may also transmit status and instructional messages related to the units involved.

In its Petition for Rulemaking, the Intelligent Transportation Society of America, ITSA did not propose a specific channelization plan, licensing method or technical rules. AASHTO has been active in the collective efforts of potential users of DSRC systems as well as equipment manufacturers in reaching consensus for adopting the best technical standards and channelization plans for DSRC systems. ITSA has developed a list of applications for DSRC systems, which are listed in its initial petition filed May 19, 1997. In total these applications have great promise to increase the safety and efficiency of the nations' surface transportation system.

The primary justification cited by the Commission in allocating the spectrum for DSRC systems was Public Safety operations. The channelization plan adopted by the Commission must guarantee that Public Safety services are allocated sufficient dedicated channels to accomplish their goals, which include the mitigation of the loss of life and property. The band plan and accompanying technical standard must also be flexible enough to allow the deployment of private services including electronic toll collection and other automated payment systems. The development of products for these systems will result in a lower cost to the Public for all systems through the economies of scale.

REPLY COMMENTS

The record in this proceeding includes the comments of the Public Safety Wireless Network, PSWIN. The PSWIN agrees that the provision of a direct link between in-vehicle or highway infrastructures and emergency services personnel is beneficial. PSWIN states that these goals are not yet within reach. AASHTO, respectfully disagrees, as a matter of fact, the purpose of this proceeding is to develop a complete record in order that the appropriate service rules and technical standards can be finalized. That action will expedite the supply of the equipment necessary for widespread deployment of DSRC systems.

AASHTO agrees with the PSWIN, that information exchange and cooperation between the first responder Public Safety members and transportation agencies will prove to be mutually beneficial.

CONCLUSION

AASHTO is a member of the ITSA DSRC Standards Writing Group. We are confident that the recommendations of that group will enable the Federal Communications Commission to release a Notice of Proposed Rulemaking which will result in the appropriate service rules for DSRC systems operations.

AASHTO has reviewed the Comments filed by the Intelligent Transportation Society of America in this proceeding and supports them in their entirety.

Further, AASHTO requests that the Commission release a Notice of Proposed Rulemaking proposing service and licensing rules for the DSRC spectrum allocation. This NPRM should include a comprehensive review of the appropriate public safety eligibility requirements, including whether such requirements encompass "nontraditional" public safety entities offering DSRC applications.

WHEREFORE, THE PREMISES CONSIDERED, AASHTO urges the Commission to act in conformity with the views expressed herein, and release a Notice of Proposed Rulemaking in response to these reply comments.

Respectfully submitted,

AMERICAN ASSOCIATION OF STATE
HIGHWAY AND TRANSPORTATION
OFFICIALS

By: _____
John Horsley
Executive Director

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