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March 13, 2002

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By Hand

Mr. William F. Caton
Acting Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, D.C. 20554

RECEIVED

MAR 13 2002

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

**Re: Year 2000 Biennial Regulatory Review
Amendment of Part 22 of the Commission's Rules
WT Docket No. 01-108
Ex Parte Communication**

Dear Mr. Caton:

Pursuant to Section 1.1206(b) of the Commission's rules, I am writing on behalf of Mercedes-Benz USA, LLC ("MBUSA"), to notify you of *ex parte* meetings with Commission staff that occurred on Tuesday, March 12, 2002, concerning issues related to the above-referenced proceeding.

The meetings were held to discuss the submissions of MBUSA in this proceeding and, specifically, whether and under what circumstances the Commission should eliminate Section 22.901 of the Commission's rules. Section 22.901 requires a cellular carrier to provide analog service to analog subscribers in good standing that request such service.

While acknowledging the value of allowing CMRS carriers the flexibility to provide the services that best respond to the desires of the marketplace and stressing the need for rapid digital build out, MBUSA urged the Commission to allow the requirements of section 22.901 to continue for at least five years after resolution of the issues raised in this proceeding. Attached to this letter is the presentation made by MBUSA.

Those participating in the meetings at the FCC were Bryan Tramont, Senior Legal Advisor to Commissioner Abernathy; Paul Margie, Legal Advisor to Commissioner Copps and Nguyen Vu, intern in the Office of Commissioner Copps; Sam Feder, Legal Advisor to Commissioner Martin; Maureen McLaughlin of

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Mr. William F. Caton

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Chairman Powell's Office, James D. Schlichting, Deputy Chief, Wireless Telecommunications Bureau; Roger Noel, Deputy Chief, Commercial Wireless Division, Linda Chang, Wireless Telecommunications Bureau, Geoff Smith and Daniel Selke of MBUSA; and Ari Fitzgerald and David Martin of Hogan & Hartson L.L.P., Counsel for MBUSA.

An original and one copy of this letter is submitted for inclusion in the proceeding record.

Respectfully submitted,



Ari Q. Fitzgerald
Counsel for MBUSA

Enclosure

cc (w/enc.): Paul Margie
Nguyen Vu
Sam Feder
Bryan Tramont
James D. Schlichting
Roger Noel
Linda Chang
Maureen McLaughlin



Mercedes-Benz

*Briefings before the
Federal Communications Commission*

on

*Telematics and the Transition of the
Analog Cellular Rules*

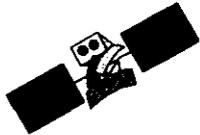
Amendment of Part 22

WT Docket 01-108

March 12, 2002



Mercedes-Benz



What is TeleAid?

In partnership with ATX Technologies, Inc., MBUSA offers TeleAid, a three-button telematics system that permits users to call for emergency assistance, roadside assistance or information.

MBUSA has an installed base of some 325,000 TeleAid units, and expects to install roughly 200,000 units per year over the next several years.

TeleAid features an emergency call system that automatically calls for help in case of an accident.

- Crash sensors detect that an accident has occurred and send a distress signal to a TeleAid call service center
- The vehicle's location, determined by an on-board GPS receiver, is relayed to the call service center
- A voice connection is made to the call center via a hands-free telephone unit; help is dispatched



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TeleAid Saves Lives

TeleAid can significantly reduce rescue response times after an accident, often resulting in saved lives. TeleAid permits trained personnel to communicate with injured occupants until help arrives. By receiving details of the accident in advance, response personnel are better prepared by the time they arrive.

TeleAid is particularly effective in rural areas, where deaths and injuries from car accidents are more frequent due to the relatively longer time it takes to get medical help to an accident scene. In 2000, 58.6% of all fatalities on America's roadways occurred in rural areas. (Source: NHTSA's Fatality Analysis Reporting System)

Out of MBUSA's installed TeleAid base of 325,000, in the past two years the call centers have received

- nearly **2,600** automatic crash notifications
- **4,200** driver-activated SOS calls requiring emergency dispatch
- **1,059** requests for stolen vehicle location assistance

The TeleAid call centers were able to screen out thousands of other calls, preventing the needless dispatch of personnel and burdening of local PSAPs. An emergency call from a telematics service provider represents a true emergency in 99% of cases.



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The Ubiquity and Technical Capabilities of AMPS Are Critical to TeleAid

TeleAid relies on analog cellular (AMPS) service, which continues to provide the only ubiquitous coverage throughout the United States, covering about 90% of the country's land area.

Despite expanding coverage areas, digital service still covers only about half of the nation's land area. (See attached coverage maps from the FCC's 6th Annual CMRS Competition Report.) POPs coverage figures are not an appropriate indicator of service ubiquity for telematics, a service that is most valuable in rural areas where emergency response times are longest.

There is no standardization in digital systems. TDMA, CDMA, iDEN and GSM standards are not interoperable. It is not feasible to design a radio device that can operate using all four standards. If the AMPS requirement is eliminated, MBUSA will be forced to choose one of the four prevailing digital standards, further reducing the areas in which roaming will be available.

AMPS provides for the simultaneous transmission of data and voice on the same channel, meaning that the caller and the vehicle information are automatically paired. This critical capability is currently not reliable in the digital environment.



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Market Forces Are Not Enough to Ensure Continued Service

Unfortunately, market forces alone are not sufficient to ensure the ubiquitous coverage needed for a safe and effective TeleAid program.

- Thus far, no nationwide mobile carrier has been willing to commit to maintaining its analog network to ensure the reliability and ubiquity of TeleAid services.
- Without such ubiquity, MBUSA cannot guarantee that TeleAid will be effective in providing assistance when needed.

MBUSA agrees with most commenters in the docket that a transition period is needed, and suggests that the Commission consider a number of factors in determining when the industry would be ready to make the change away from AMPS.



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Recommended Prerequisites for Digital Transition

Determine that ubiquitous digital service exists, which could be achieved through either:

- the adoption of a common standard in the industry, thus permitting roaming, or
- through pervasive nationwide digital penetration (including rural as well as non-rural areas) by a carrier or carriers using any one standard.

Combined voice/data transmissions can occur reliably on digital networks throughout the country.

To ensure that TeleAid remains affordable, the price point for the technology permitting nationwide roaming (e.g., dual or tri-mode capability) drops to an acceptable level.

- The incremental cost should be less than \$25 per unit.



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Automotive Production Cycles Require Significant Advance Planning

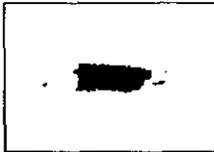
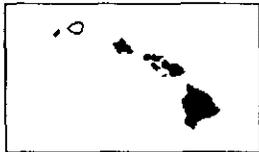
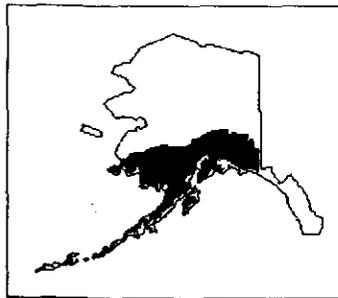
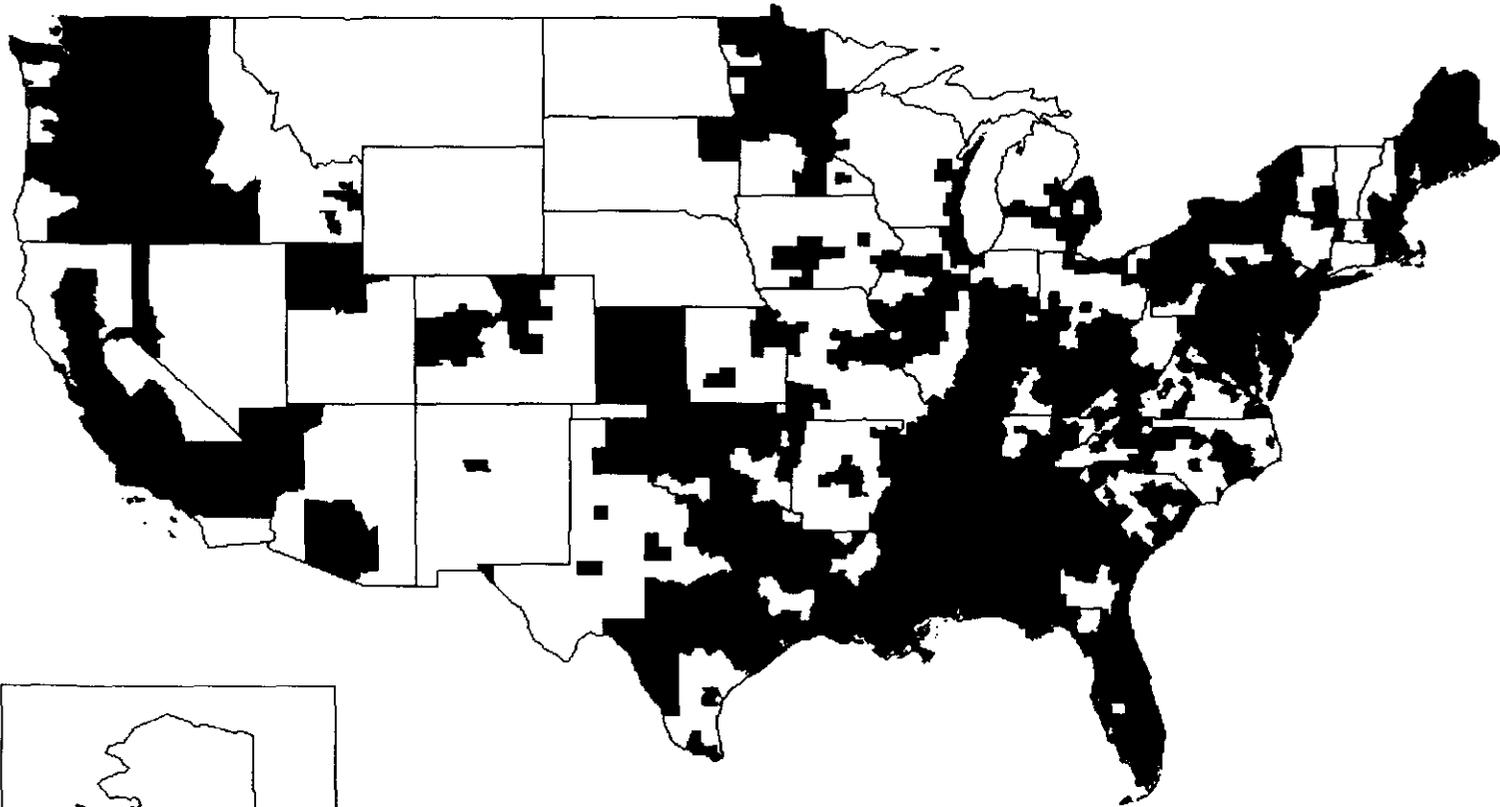
Because of the time required to design and deploy telematics devices, and because of the high cost of making changes to telematics devices already deployed, the Commission should give ***at least five years'*** notice to the industry before any elimination of the AMPS standard becomes effective.

The Commission should keep in mind that the production cycle for automobiles significantly affects the ability of automobile manufacturers to respond to the elimination of the AMPS standard.

- Automobile manufacturers require significant lead time to prepare for the elimination of AMPS.
- A typical automobile platform lasts seven years and MBUSA automobiles that are sold will be on the road for up to 20 years.
- To ensure crash survivability, devices are securely embedded within the vehicle, making replacement of legacy units difficult and costly.

MBUSA feels a responsibility to ensure that its cars continue to have the ability to communicate with safety personnel when accidents occur.

Estimated Rollout with TDMA-based Coverage

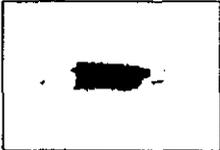
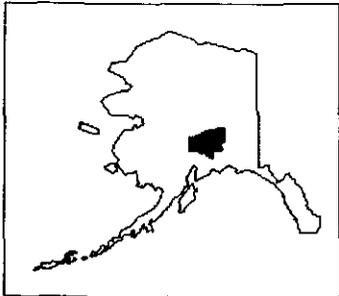
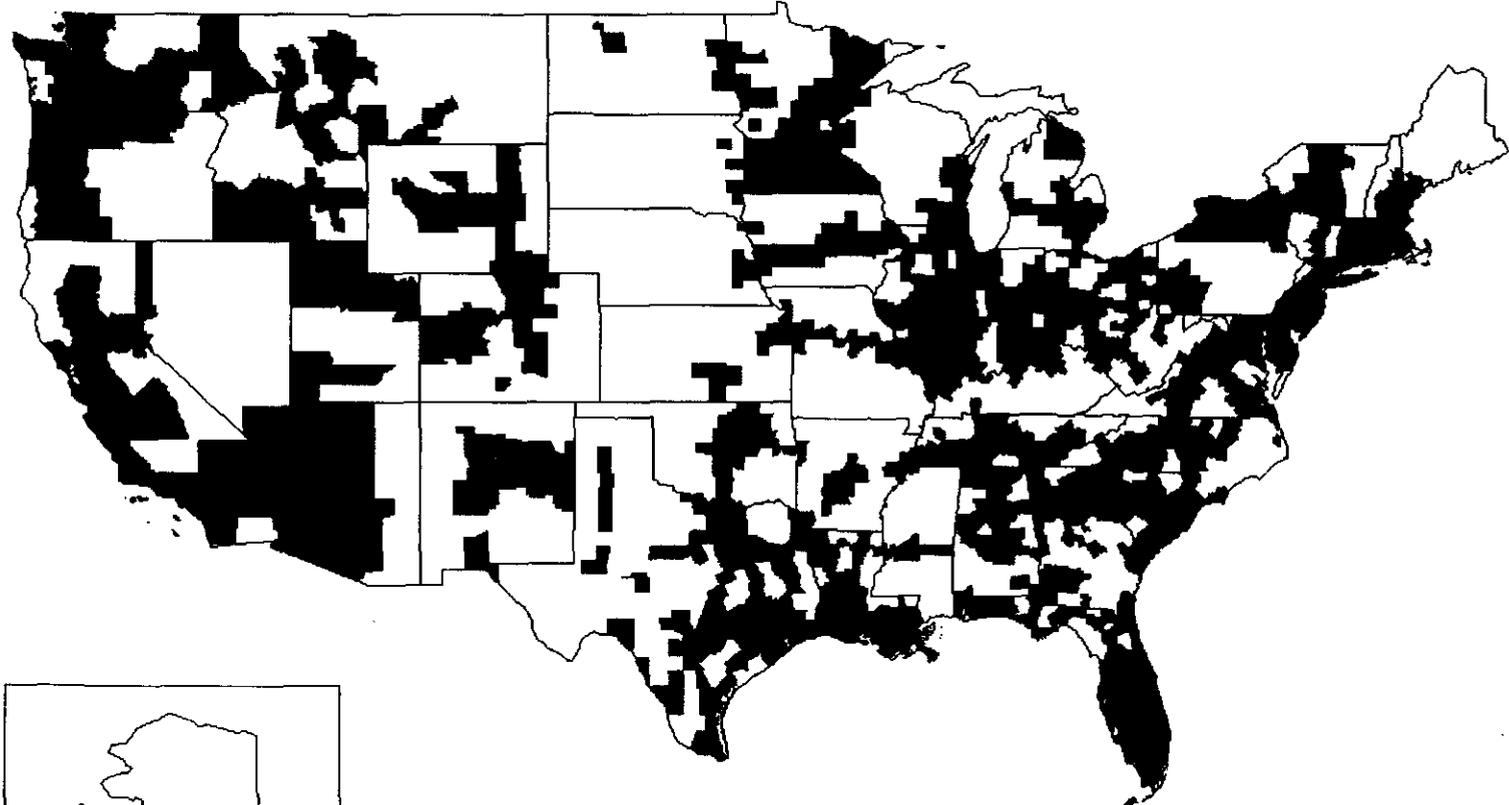


Note: Coverage estimates based on publicly available sources.

Area with TDMA Coverage

- TDMA-Based Coverage
- No Coverage

Estimated Rollout with CDMA-based Coverage

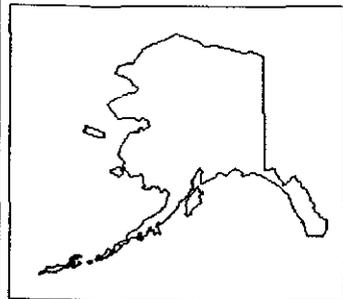
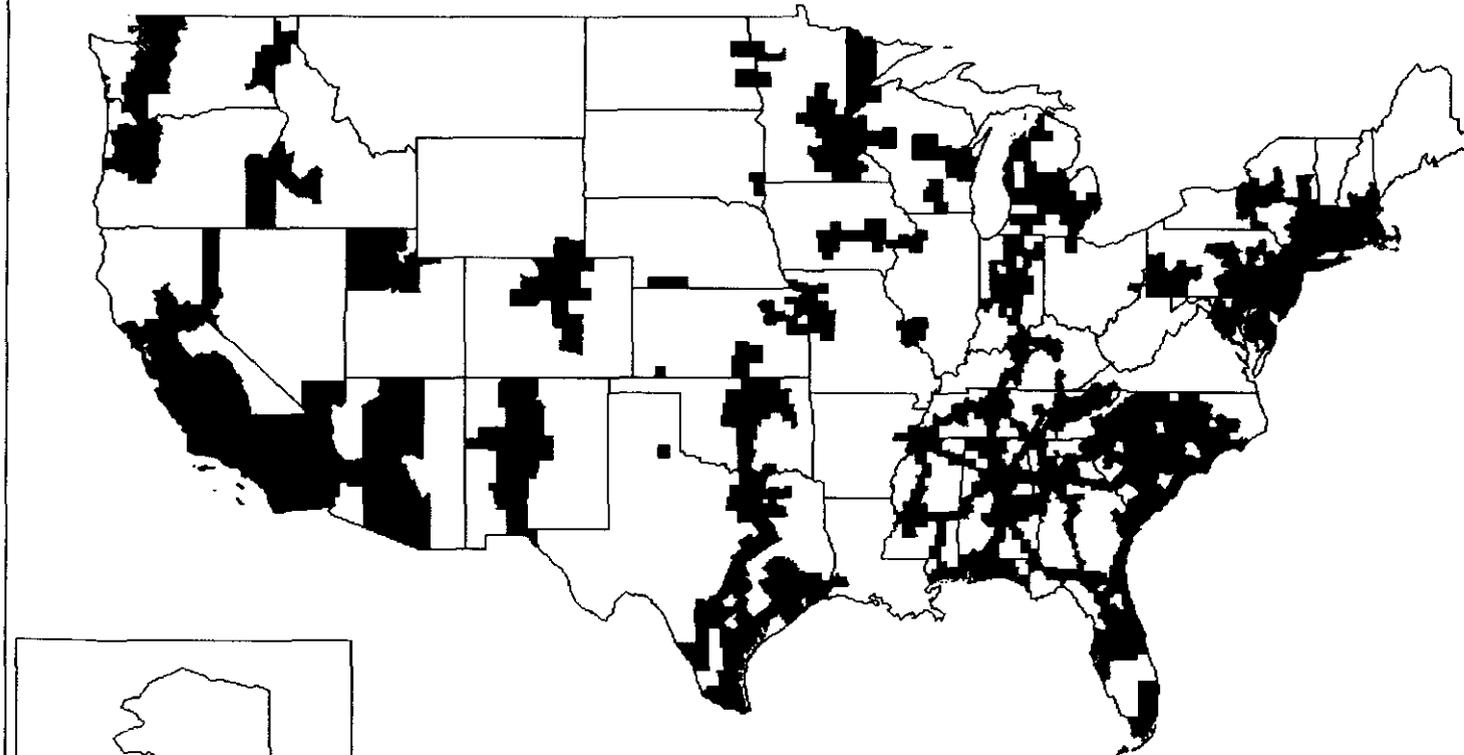


Note: Coverage estimates based on publicly available sources.

Area with CDMA Coverage

- CDMA-Based Coverage
- No Coverage

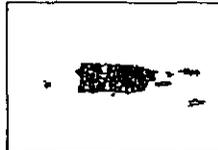
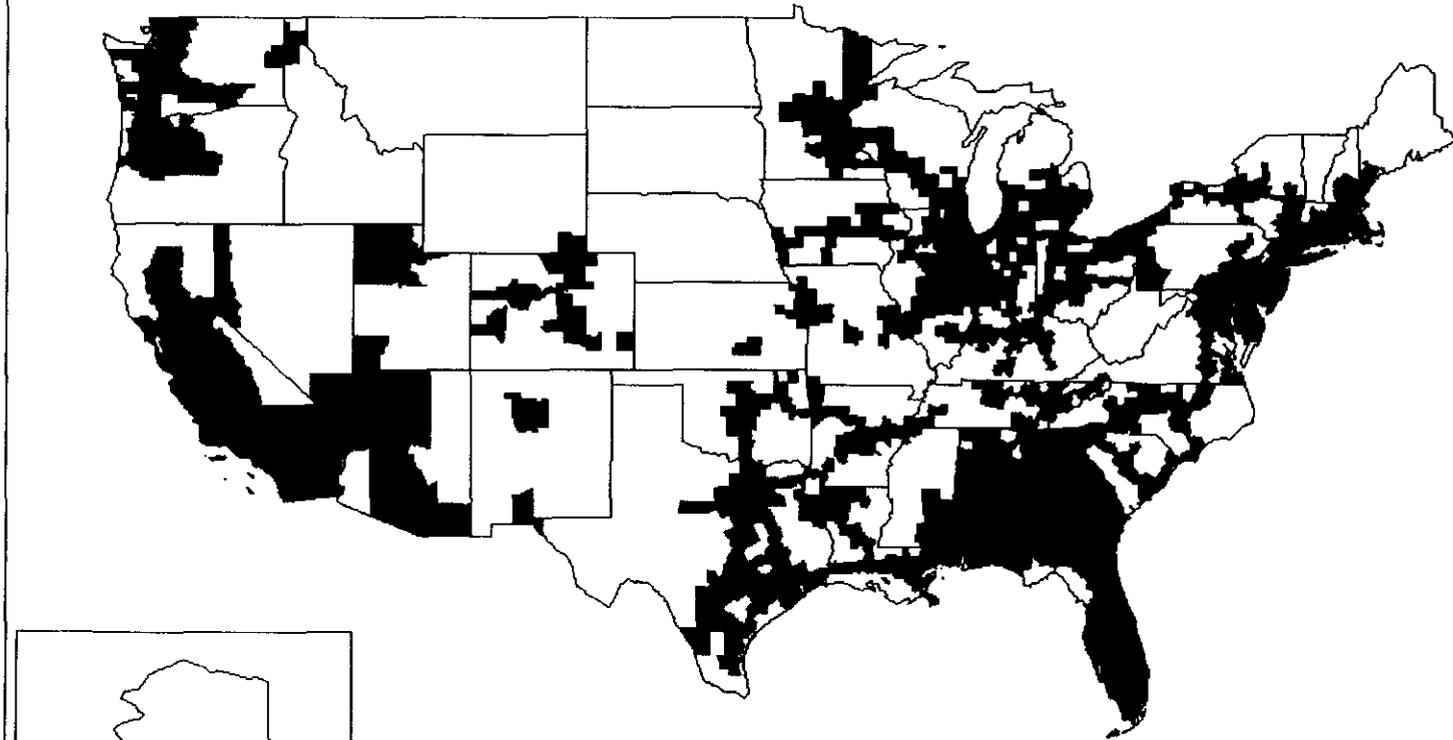
Estimated Rollout with GSM-based Coverage



Note: Coverage estimates based on publicly available sources.

Area with GSM Coverage
■ GSM-Based Coverage
□ No Coverage

Estimated Rollout with iDEN-based Coverage



Note: Coverage estimates based on publicly available sources.

Area with iDEN Coverage

- iDEN-Based Coverage
- No Coverage



Robert Hoover Tele Aid Testimonial Midland, Texas

Out in West Texas, residents embrace the freedom that comes with wide-open spaces and lonely stretches of highway. But on the morning of June 6, 2001, the vast Texas plains could have spelled disaster for Midland, TX, businessman Robert Hoover. Hoover was headed for work that morning in his 2001 SL 500 when he crested a small rise and into an intersection, broad-siding a vehicle.

“My mind must have been on work because this is a bad intersection. They have accidents there all the time,” Hoover noted.

Hoover said the cars collided with such force that it was later determined his car spun seven times before it came to rest.

“All I remember is that when the car finally quit spinning around, I suddenly heard a voice in the car say to me: Mr. Hoover are you all right? At first, I thought God was talking to me. Then I remembered the Tele Aid system,” Mr. Hoover recalls. “I couldn’t believe the system would respond that fast.”

And, for that alone, Robert Hoover is thankful, for he acknowledges he was disoriented (possibly in shock), the driver in the other vehicle appeared to be in shock and injured, and “we were out in the middle of nothing, miles from help.”

“All through this, the guy with Tele Aid was very composed, knew exactly where we were, got emergency help to us in what seemed like only five minutes, and even called my significant other only minutes after the accident, so she got to the scene fairly quickly to help me” said Hoover.

As it turned out, Hoover walked away from the collision with hardly a scratch. “Had I been in any other vehicle than a Mercedes, I probably would have easily been a dead man. But the reason I spent the money for a Mercedes is for the extra safety...and even though I didn’t think much about it when I bought it, the Tele Aid system ...well, all I can say is: It makes a difference. This system should be on every vehicle.”

Today, Robert Hoover is back driving another SL500: “I know a good machine when I drive one.” And, he should, because it’s his business: Mr. Hoover owns the local distributorship for Harley-Davidson motorcycles.

Dallas

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Timothy Errington Tele Aid Testimonial Riverside, Rhode Island

On May 25, 2001, Mr. Timothy Errington of Riverside, Rhode Island was on his way home in his 2001 ML 320 Mercedes-Benz when he stopped to turn left onto his street and was suddenly rear-ended by another car, traveling at approximately 45 to 50 mph. The impact of the collision propelled his vehicle into the two opposite lanes of oncoming traffic. Mr. Errington recalls, "In less than 10 seconds I was contacted by a Response Specialist who asked if I was okay and whether or not I needed police, ambulance or fire department dispatched." Mr. Errington stated that it was very reassuring and comforting to know that Tele Aid was so spontaneous. "I couldn't be more satisfied with Tele Aid", Mr. Errington said. "When my Tele Aid contract expires, I will most definitely renew and continue Tele Aid." Since the accident, Mr. Errington has recommended Mercedes-Benz and Tele Aid to his wife and friends.

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Susan Cirrincione Tele Aid Testimonial Pittsburgh, Pennsylvania

Are you interested in video/commercials? Yes

On May 25, 2001, Mrs. Cirrincione and her three children, ages 6, 11, and 13, from Robinson Township, Pennsylvania were traveling from Sewickley, Pennsylvania when another vehicle ran a red light and broad-sided their 2001 Mercedes-Benz ML320, causing the side airbags to deploy.

Mrs. Cirrincione stated that she was very shaken after the accident and couldn't even think of her husband's cell phone number to call him. She recalls, "It was very comforting to know that someone was there and able to get help for me so quickly. They made sure emergency services were on the way then they called my husband, and when he was not available, they contacted my father." She states that prior to this experience, "I wasn't convinced about the benefits of Tele Aid; however since the accident, I'm convinced that it is a wonderful system, and I would definitely consider having it available in the future. It's nice to know that if I ever need assistance in an isolated area, I can easily receive it."

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William Madison Testimonial, Wilmington, Delaware

On May 27, 2001, Mr. Madison of Wilmington, Delaware was driving his 2001 CLK 320 Mercedes-Benz, when he was struck by a vehicle that ran a red light, causing his airbag to deploy. Mr. Madison was immediately contacted by a Response Specialist who dispatched police, ambulance and fire units to the scene of the crash. Mr. Madison said, "I was very happy to have had Tele Aid to assist me during this incident and would consider this similar type service when searching for a vehicle in the future." Mr. Madison was fully aware of his Tele Aid service and how the system worked, but didn't expect to have to use it.

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Lilly Holdbrook's Testimonial

On the morning of April 3, Lilly Holdbrook of Sewell, N.J. was driving her 2001 Mercedes ML320 from work when she slowed down due to traffic congestion ahead of her. She noticed in her rear view mirror that an 18-wheel semi truck was bearing down on her car. "I knew there was no way he was going to be able to stop," she recalled. The truck rear-ended Ms. Holdbrook's car at an estimated speed of 55 miles per hour. Upon impact, the sensor in the emergency tensioning retractor on the driver's seat belt harness (part of the Mercedes Tele Aid system), automatically placed a direct phone call with Ms. Holdbrook's location to the Tele Aid Response Center.

"All I remember is seeing the SOS signal on the dashboard and then hearing the voice of a very nice lady telling me that police and a fire rescue unit were on the way," said Ms. Holdbrook, who suffered bruises and back pain. "She also immediately connected me to my husband."

Ms. Holdbrook's experience reinforced her perception that Mercedes makes the safest car on the road. "I would not feel comfortable ever driving again without a Tele Aid system. It's really good to know there's somebody who can always find you if you ever need help."

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Ellen Lewis' Tele Aid Testimony

Even a martial arts master can use the emergency assistance of Mercedes-Benz Tele Aid in a dangerous situation. Ellen Lewis, a black belt in tae kwon do, found out exactly why when a traffic accident escalated into a threatening assault on her person and property.

Lewis, who lives in Los Angeles, California, has been a dedicated Mercedes-Benz driver for seven years. She recently purchased a 2001 C-Class sedan, which includes the Tele Aid telematics system as a standard feature. She remembers asking the sales person at the dealership what the red SOS button was for. The SOS button alerts the Tele Aid Response Center in Dallas, operated around the clock by ATX Technologies. Using location-identification technology, the Center can pinpoint the whereabouts of a telematics-equipped vehicle and direct police or emergency services to the scene.

"When he told me what the button did, I told him right then that there would be a time I would need to use it," said Lewis. "I'm employed as a fit model, which often requires me to work late with garment manufacturers. I often find myself in dark, industrial areas after dark."

Lewis' first use of the SOS button occurred rather unexpectedly, as what might have been a rather ordinary traffic incident spun out of control. Lewis was turning out of a retail parking lot when a car suddenly struck the passenger side of Lewis's car.

Lewis backed up, got out of her car and approached the other driver, a woman, who had also stepped out of her car. As Lewis prepared to exchange insurance information, the other woman became extremely agitated and started screaming, preventing Lewis from retrieving her cell phone from her purse to call for help.

Remembering the SOS button in her Mercedes, Lewis next attempted to get back into the car to alert the Tele Aid Response Center. The other woman pursued her and began hanging on the car door to prevent her from shutting it. She even began scratching the glass.

Fortunately, Lewis was able to immediately start her car, push the SOS button, and drive a short distance away from the scene. Lewis told the Tele Aid Response Specialist what was happening and asked for police help. The Response Specialist also contacted Lewis' insurance agent.

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Lewis drove around the block and parked near the site of the incident to wait for police. But then she looked out to find that the other woman had followed her and was now blocking her exit path. And then the other woman even tried to pull Lewis out of her car, so Lewis locked the doors and continued to relay details of her situation to the Tele Aid Response Specialist. Police soon arrived and calmed the woman.

Lewis was fortunate to have the Tele Aid system in addition to a cell phone.

"I found Tele Aid more useful than my cell phone," Lewis said. "I knew exactly where the SOS button was, and I wasn't able to get to my cell phone."

Lewis is glad she had the additional means of contacting help, and now considers it an important safety necessity worth recommending to friends.

"I will never have another car without a Tele Aid system," Lewis said. "I know there will be other times when I'll need that button again. I'd tell any woman who travels extensively that they must have this system in case of an emergency. I've told two friends who travel frequently, and they have both purchased cars with these systems."

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Ed Shaw's Tele Aid Testimonial

Edward Shaw of Wayne, N.J. was driving his 2001 E320 when a driver emerged from a side street and collided into the left front of Mr. Shaw's vehicle, wrapping around the front of Mr. Shaw's car and coming to rest on the passenger-side of the vehicle.

"When I heard a voice asking me if I was alright, I thought I was dead and God was talking to me and then I remembered my Tele Aid," recalls Mr. Shaw. "I can't tell you how reassuring it was after something like that to hear a voice telling you that they were going to stay with you until help arrived. I'm going to buy another Benz for my daughter and I will never own another vehicle without it. I'm going out in the street and shout out loud Mercedes is the safest car in the world - safety with complete security around you. Believe me!"

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de Prat's Tele Aid Testimonial

On March 29, 2001, Alvaro de Prat of Coral Gables, FL., was trying to navigate his way home at night in a torrential downpour along a traffic-clogged turnpike west of Miami when a sports utility van rear-ended his Mercedes-Benz E320. The impact propelled his car forward into the rear of another car. "It was a terrible feeling because it was dark, it was raining so hard I couldn't even get out of my car, and everything in my pocket—including my cell phone – ended up under my seat when my car got hit and I couldn't find it," Mr. de Prat recalls. "So, I couldn't even call anyone for help." But seconds later, help came through the dashboard when the voice of a Tele Aid Response Specialist asked if he was all right. At first, Mr. de Prat couldn't determine how Tele Aid had been notified because the air bags hadn't deployed, thereby sending a signal to the Tele Aid Response Center. "But I found out that not all collisions activate the air bags and that's why Mercedes also includes sensors in the seat belts as an extra precaution. That's a terrific feature." The Tele Aid response specialist helped Mr. de Prat by contacting his wife and by talking with him for nearly 20 minutes until the Highway Patrol could thread its way through traffic and arrive at the accident scene. "I can't commend Mercedes enough for providing this service and the gentleman at Tele Aid who helped me. This is the first car accident I've had in my life and I can't tell you, in a situation like that, how much it really helps to have somebody to talk to and reassure you that help's on the way.

Mr. de Prat has been driving Mercedes-Benz cars for over 30 years, and he says Tele Aid simply complements what he has grown to expect from Mercedes – unequaled quality and service. "Mercedes-Benz is the best and will always be my brand of car."

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David & Ingrid Short's Tele Aid Experience

David Short of Dallas, TX stated that his wife Ingrid was driving their 2000, E320 when she was involved in an accident. He stated, "My wife was most impressed with the Tele Aid system, when she was recently involved in an accident with the airbags deploying. At first, she wasn't sure who was talking to her, then she realized it was a Tele Aid representative. Since we had never used the emergency system, Ingrid was quite surprised to hear the voice. Her first thought was that she was talking to God. She was most impressed at how quickly the police and MICU arrived at the scene. Since then, purchased a 2001 E 320 and the Tele Aid service was a strong consideration in the decision."

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Fatality Analysis Reporting System (FARS) Web-Based Encyclopedia



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Persons Killed, by Person Type

State:

Year:

Person Type	Persons Killed
Vehicle Occupants	
Driver	25,492
Passenger	10,669
Unknown Occupant	88
<i>Subtotal</i>	<i>36,249</i>
Nonmotorists	
Pedestrian	4,739
Pedalcyclist	690
Other/Unknown	143
<i>Subtotal</i>	<i>5,572</i>
Total	41,821

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Persons Killed, by Age

State:

Year:

Age	Persons Killed
< 5	706
5 - 9	721
10 - 15	1,384
16 - 20	5,922
21 - 24	4,023
25 - 34	6,820
35 - 44	6,747
45 - 54	5,189
55 - 64	3,292
65 - 74	2,782
75 +	3,861
Unknown	374
Total	41,821

Persons Killed, by Sex

State:

Year:

Sex	Total
Male	28,280
Female	13,285
Unknown	256
Total	41,821

Persons Killed in Crashes by Weather Condition and Light Condition

State:

Year:

Weather Condition	Light Condition					Total
	Daylight	Dark, but Lighted	Dark	Dawn or Dusk	Unknown	
Normal	18,669	5,763	10,588	1,404	52	36,476
Rain	1,495	543	809	141	5	2,993
Snow/Sleet	488	95	354	63	0	1,000
Other	292	109	396	72	3	872
Unknown	63	13	60	5	339	480
Total	21,007	6,523	12,207	1,685	399	41,821

Persons Killed in Crashes by Speed Limit and Crash Type

State:

Year:

Speed Limit	Crash Type				Total	
	Single Vehicle		Multiple Vehicle			
	Number	Percent	Number	Percent	Number	Percent
30 mph or less	2,917	12.9	1,149	6.0	4,066	9.7
35 or 40 mph	3,880	17.2	2,851	14.8	6,731	16.1
45 or 50 mph	3,497	15.5	3,729	19.3	7,226	17.3
55 mph	6,740	29.9	6,936	36.0	13,676	32.7
60 mph or higher	4,711	20.9	4,193	21.7	8,904	21.3
No Statutory Limit	128	0.6	42	0.2	170	0.4
Unknown	666	3.0	382	2.0	1,048	2.5
Total	22,539	100.0	19,282	100.0	41,821	100.0

SAVE AS TEXT

VIEW SPREADSHEET

Persons Killed in Crashes by Speed Limit and Land Use

State:

Year:

Speed Limit	Land Use						Total	
	Rural		Urban		Unknown			
	Number	Percent	Number	Percent	Number	Percent	Number	Percent
30 mph or less	1,021	25.1	2,902	71.4	143	3.5	4,066	100.0
35 or 40 mph	1,990	29.6	4,548	67.6	193	2.9	6,731	100.0
45 or 50 mph	3,683	51.0	3,368	46.6	175	2.4	7,226	100.0
55 mph	10,829	79.2	2,365	17.3	482	3.5	13,676	100.0
60 mph or higher	6,465	72.6	2,365	26.6	74	0.8	8,904	100.0
No Statutory Limit	153	90.0	16	9.4	1	0.6	170	100.0
Unknown	383	36.5	383	36.5	282	26.9	1,048	100.0
Total	24,524	58.6	15,947	38.1	1,350	3.2	41,821	100.0

SAVE AS TEXT

VIEW SPREADSHEET

Persons Killed in Construction/Maintenance Zones, by Roadway Function Class and Person Type

State:

Year:

Roadway Function Class	Person Type						Total
	Driver	Passenger	Pedestrian	Pedalcyclist	Other Nonmotorist	Unknown	
Principal Arterial							
Interstate	157	80	38	0	5	0	280
Freeway or Expressway	30	11	13	0	0	0	54
Other	181	70	49	4	3	0	307
Minor Arterial	104	35	21	4	0	0	164
Collector	89	33	17	2	0	0	141
Local Road or Street	57	23	13	1	1	0	95
Unknown	34	12	6	0	0	0	52
Total	652	264	157	11	9	0	1,093

SAVE AS TEXT

VIEW SPREADSHEET

Send suggestions and requests for technical assistance to:
FARS.Webmaster@nhtsa.dot.gov

