

VIIC_{ONSORTIUM}

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May 10, 2011

Ms. Marlene Dortch, Esq.
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Subject: Possible Revision or Elimination of Rules Under the
Regulatory Flexibility Act, CB Docket No. 09-229, DA 11-412

Dear Ms. Dortch:

The Vehicle Infrastructure Integration Consortium (VIIC), whose members include BMW Group, Chrysler LLC, Ford Motor Company, General Motors, Honda, Nissan, Mercedes-Benz RDNA, Toyota, and Volkswagen Group, appreciates the opportunity to provide comments on the subject notice regarding regulatory review of certain FCC rules. Periodic review of FCC (and other agency) rules “to minimize any significant impact on a substantial number of small entities,” is commendable and necessary. However, the VIIC recommends that the FCC regulations identified for review associated specifically with 5.9 GHz Dedicated Short Range Communications (DSRC) systems (47 CFR Part 90, Subpart M) not be revised or rescinded.

The VIIC has been involved with the U.S. Department of Transportation (and other stakeholders) in research and development regarding 5.9 GHz DSRC systems. The vehicle-to-vehicle (V2V) and vehicle-to-infrastructure (V2I) cooperative safety communications provided by these systems will support important vehicle safety, as well as mobility and environmental objectives, in the U.S. The current requirements in 47 CFR Part 90, Subpart M are essential to the effective nationwide deployment of V2V and V2I cooperative vehicle safety systems. The VIIC joined the USDOT at an April 19, 2011 meeting with FCC staff to provide an update on the work being done to support the introduction of 5.9 GHz DSRC based technologies.

The VIIC does not have any specific revisions to recommend for 47 CFR Part 90, Subpart M. We do, however, recommend that this Subpart not be rescinded. A rescission could set back significantly DSRC deployment and open the door to divergent regulations from a multitude of U.S. states. Such action would make deployment of 5.9 GHz DSRC systems for cooperative safety impracticable for both system providers and users. A successful DSRC system deployment will depend heavily on the consistency of requirements across all U.S. jurisdictions, as provided for under current FCC rules.

If you have questions on these comments, please contact Vann Wilber by phone at (248) 396-7696 or email at vwilber@viiconsortium.org.

Sincerely,



Tom Schaffnit
President, VIIC

cc: Sharon K. Stewart, FCC Office of Communications Business Opportunities
Valerie Briggs, RITA ITS Joint Program Office