

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

In the Matter of)
)
Revision of Part 15 of the Commission’s Rules) ET Docket No. 13-49
to Permit Unlicensed National Information)
Infrastructure (U-NII) Devices in the 5 GHz)
Band)
)

Delphi is a leading global supplier of mobile electronics and transportation systems, including powertrain, safety, thermal, electrical/electronic architecture, controls and security systems and is a developer and manufacturer of automotive products which include vehicle safety and electronics systems.

Delphi would be the developer and manufacturer of Dedicated Short Range Communications (DSRC) hardware as well as a developer of DSRC applications. We have invested significant effort in the participation and development of technologies for future V2V and V2I applications and products. Activities include participation in the VII Michigan Test Bed (2005-2008), ITS World Congress demonstration (2008), Standards development with SAE (2005 – 2011), and are currently a key participant in the USDOT Safety Pilot (2012-2013). We also participate in numerous activities in the European market. Delphi believes that V2V and V2I utilization of the 5.9 GHz spectrum will be an important addition to future OEM safety products.

Commentary & Recommendations

Delphi asks the FCC to ensure that the potential safety benefits associated with connected vehicle technology not be compromised by the FCC’s proposal for Unlicensed National Information Infrastructure (U–NII) Devices in the 5 GHz Band.

For the OEM market, safety applications must be technically sound and be proven reliable. There is a potential that U-NII use of the 5 GHz band could cause harmful co-channel, adjacent channel, and/or out-of-band interference to DSRC services. This interference could degrade DSRC Vehicle to Vehicle and Vehicle to Infrastructure communications and make it difficult to confidently develop new latency-sensitive safety applications. In light of this, Delphi urges the FCC to ensure that exhaustive testing be done to guarantee no harmful interference

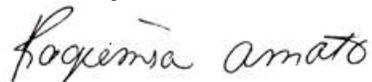
will occur from unlicensed use of the 5 GHz spectrum before the FCC moves forward with the current proposal for unlicensed use.

Allowing unlicensed products in the same spectrum would require higher degrees of testing and validation of these products than has occurred to date to ensure that there will be no un-intentional interference. We would therefore recommend a formulation of product testing and validation procedures for all unlicensed products utilizing the 5 GHz spectrum to ensure consistency of product and no interference during utilization. Needed areas of testing would include communication latency due to heavy usage of unlicensed operations for co-channel, adjacent channel, and out-of-band usage.

We also recommend that the Commission should await the results of NTIA's 5.9 GHz Band Study and the finalization of a U.S. position on compatibility before proceeding with a proposal for unlicensed use.

Thank you for this opportunity to comment on this important rulemaking. If you have any questions regarding our response please contact me at 248-813-2085.

Sincerely,

A handwritten signature in black ink that reads "Ragiemra Amato". The signature is written in a cursive, flowing style.

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