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October 21, 2013

Ms. Marlene Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Room TW-A325
Washington, D.C. 20554

Re: Ex Parte Notice

ET Docket No. 13-49

Dear Ms. Dortch:

On September 30, 2013, Harry M. Lightsey III, General Motors Company ("GM") Executive Director, Global Connected Consumer, Global Infotainment and OnStar Public Policy; Stephen G. Gehring, GM Director, Global Public Policy, and the undersigned, met with Acting Commission Chairwoman Mignon Clyburn, and Louis Peraertz, Legal Advisor to Acting Chairwoman Clyburn. The purpose of the meeting was to discuss issues raised in the above-referenced proceeding.

The GM representatives addressed specific issues raised in the proceeding that affect the viability of Dedicated Short Range Communications ("DSRC") in the 5850-5925 MHz ("5.9 GHz") band, noting that according to the National Highway Traffic Safety Administration ("NHTSA"), DSRC vehicle-to-vehicle ("V2V") applications could potentially address about 80 percent of all vehicle crashes involving non-impaired drivers.

The GM representatives noted GM's support for the deployment of DSRC (especially V2V safety) communications. In light of GM's investment of significant financial and human resources in support of DSRC, and DSRC's tremendous potential to improve road safety, the GM representatives urged that the Commission not take any actions in the pending 5 GHz proceeding to make DSRC communications susceptible to harmful interference from unlicensed (including Wi-Fi) devices.

The GM representatives reiterated GM's commitment to responsibly examine whether sharing between DSRC and Unlicensed National Information Infrastructure ("U-NII") devices in the 5 GHz band is possible, and noted the engagement on potential sharing proposals that has already taken

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place between automobile manufacturers and proponents of expanded 5 GHz U-NII device use. Nevertheless, the GM representatives stressed the safety-related nature of DSRC (particularly V2V) communications and urged that the Commission proceed with extreme caution before expanding U-NII device operations in or near the 5.9 GHz DSRC band. If, as a result of industry collaboration and Commission and NTIA review, the Commission concludes that sharing between DSRC and U-NII devices might be feasible, the GM representatives urged the Commission to require extensive bench and field testing of any proposed technical solutions to facilitate such sharing, and seek public comment on the proposal and test results, before establishing final rules for such sharing.

Pursuant to Section 1.1206 of the Commission's rules, an electronic copy of this letter is being filed for inclusion in the above-referenced docket.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Ari Q. Fitzgerald', is written over a horizontal line.

Ari Q. Fitzgerald
Counsel to General Motors Company

cc: Acting Chairwoman Clyburn
Louis Peraertz