

February 5, 2014

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: ET Docket No. 13-49, *Revision of Part 15 of the Commission's Rules to Permit Unlicensed National Information Infrastructure (U-NII) Devices in the 5 GHz Band*

Dear Ms. Dortch:

In their comments and reply comments in this proceeding, the Alliance of Automobile Manufacturers ("Alliance")¹ and Association of Global Automakers ("Global")² have urged the Federal Communications Commission ("Commission") to act deliberately and cautiously in examining whether to allow Unlicensed National Information Infrastructure ("U-NII") use of the 5850-5925 MHz ("5.9 GHz") Dedicated Short Range Communications Service ("DSRC") and nearby bands.³ The Alliance and Global have urged Commission restraint because of the severe negative impact that harmful interference from U-NII devices would have on the viability of the U.S. Department of Transportation's ("DOT") and National Highway Traffic Safety Administration's ("NHTSA") vehicle-to-vehicle ("V2V") communications program.⁴ The Alliance and Global filings indicated that implementation of V2V was "at an advanced stage," detailed the significant progress made thus far in developing, testing and fine-tuning V2V, and noted NHTSA's intention to soon consider mandating the deployment of connected vehicle technologies in all new vehicles.⁵

1 The Alliance is an association of twelve of the world's leading car and light truck manufacturers, including BMW Group, Chrysler Group LLC, Ford Motor Company, General Motors Company, Jaguar, Land Rover, Mazda, Mercedes-Benz USA, Mitsubishi Motors, Porsche, Toyota, Volkswagen Group of America, and Volvo Cars. See Alliance of Automobile Manufacturers, Members, <http://www.autoalliance.org/about-the-alliance/overview>.

2 Global represents international motor vehicle manufacturers, original equipment suppliers, and other automotive-related trade associations. Its members include American Honda Motor Co., Aston Martin Lagonda of North America, Inc., Ferrari North America, Inc., Hyundai Motor America, Isuzu Motors America, Inc., Kia Motors America, Inc., Maserati North America, Inc., McLaren Automotive Ltd., Nissan North America, Inc. Peugeot Motors of America, Subaru of America, Inc., Suzuki Motor of America, Inc., and Toyota Motor North America, Inc. See Global Automakers, Members, <http://www.globalautomakers.org/members>.

3 See Comments of Alliance and Global, ET Docket No. 13-49 (filed May 28, 2013) ("Alliance and Global Comments"); Reply Comments of Alliance and Global, ET Docket No. 13-49 (filed July 24, 2013).

4 See, e.g., Alliance and Global Comments at 1-3.

5 *Id.* at 4-5.

Consistent with the Alliance and Global filings, the attached DOT press release provides additional evidence that V2V communications based on DSRC technologies in the 5.9 GHz Band are at an advanced stage of development and are nearing readiness for deployment. The press release explains that NHTSA will begin taking steps to enable V2V communications technology for light vehicles,⁶ and indicates that NHTSA is currently finalizing its analysis of the data gathered during DOT's year-long V2V pilot program, which used 3,000 vehicles in the largest-ever road test of V2V technology.⁷ NHTSA will publish a research report on V2V technology for public comment in the coming weeks.⁸ Then, it will begin working on a regulatory proposal to require new vehicles to have V2V technology.⁹

This most recent announcement provides further evidence, consistent with the Alliance's and Global's filings in this proceeding, that V2V technologies using DSRC in the 5.9 GHz band are being readied for deployment and must be adequately protected from harmful interference. Indeed, the Secretary of Transportation referred to the announcement "as a watershed moment in the nation's history— akin to the launch of the interstate highway system or a moonshot."¹⁰ DOT believes that the announcement itself will "significantly enhance development of V2V technology and pave the way for market penetration of V2V safety applications."¹¹ With the widespread launch and adoption of DSRC-connected vehicles so near, the Commission must exercise caution in its consideration of whether to allow U-NII devices to operate in or near the 5.9 GHz DSRC band and ensure that all of this promising V2V activity is not undermined or nullified.

Pursuant to Section 1.1206(b)(2) of the Commission's rules, an electronic copy of this letter is being filed for inclusion in the above-referenced docket.

Respectfully submitted,



Ari Q. Fitzgerald

Counsel to the Alliance of Automobile Manufacturers and Association of Global Automakers

Attachment

6 Press Release, National Highway Traffic Safety Administration, *U.S. Department of Transportation Announces Decision to Move Forward with Vehicle-to-Vehicle Communication Technology for Light Vehicles*, Feb. 3, 2014 ("*DOT Press Release*").

7 *Id.*

8 *Id.*

9 *Id.*

10 See <http://union-bulletin.com/news/2014/feb/04/bandwidth-issue-wired-vehicles/>

11 *DOT Press Release.*



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U.S. Department of Transportation Announces Decision to Move Forward with Vehicle-to-Vehicle Communication Technology for Light Vehicles



NHTSA 05-14

Monday, February 3, 2014

Contact: Nathan Naylor, 202-366-9550, Public.Affairs@dot.gov

WASHINGTON - The U.S. Department of Transportation's (DOT) National Highway Traffic Safety Administration (NHTSA) announced today that it will begin taking steps to enable vehicle-to-vehicle (V2V) communication technology for light vehicles. This technology would improve safety by allowing vehicles to "talk" to each other and ultimately avoid many crashes altogether by exchanging basic safety data, such as speed and position, ten times per second.

"Vehicle-to-vehicle technology represents the next generation of auto safety improvements, building on the life-saving achievements we've already seen with safety belts and air bags," said U.S. Transportation Secretary Anthony Foxx. "By helping drivers avoid crashes, this technology will play a key role in improving the way people get where they need to go while ensuring that the U.S. remains the leader in the global automotive industry."

DOT research indicates that safety applications using V2V technology can address a large majority of crashes involving two or more motor vehicles. With safety data such as speed and location flowing from nearby vehicles, vehicles can identify risks and provide drivers with warnings to avoid other vehicles in common crash types such as rear-end, lane change, and intersection crashes. These safety applications have been demonstrated with everyday drivers under both real-world and controlled test conditions.

The safety applications currently being developed provide warnings to drivers so that they can prevent imminent collisions, but do not automatically operate any vehicle systems, such as braking or steering. NHTSA is also considering future actions on active safety technologies that rely on on-board sensors. Those technologies are eventually expected to blend with the V2V technology. NHTSA issued an Interim Statement of Policy in 2013 explaining its approach to these various streams of innovation. In addition to enhancing safety, these future applications and technologies could help drivers to conserve fuel and save time.

V2V technology does not involve exchanging or recording personal information or tracking vehicle movements. The information sent between vehicles does not identify those vehicles, but merely contains basic safety data. In fact, the system as contemplated contains several layers of security and privacy protection to ensure that vehicles can rely on messages sent from other vehicles and that a vehicle or group of vehicles would be identifiable through defined procedures only if there is a need to fix a safety problem.

In August 2012, DOT launched the Safety Pilot "model deployment" in Ann Arbor, Mich., where nearly 3,000 vehicles were deployed in the largest-ever road test of V2V technology. DOT testing is indicating interoperability of V2V technology among products from different vehicle manufacturers and suppliers and has demonstrated that they work in real-world environments.

In driver clinics conducted by the Department prior to the model deployment, the technology showed high favorability ratings and levels of customer acceptance. Participants indicated they would like to have V2V safety features on their personal vehicle.

"V2V crash avoidance technology has game-changing potential to significantly reduce the number of crashes, injuries and deaths on our nation's roads," said NHTSA Acting Administrator David Friedman. "Decades from now, it's likely we'll look back at this time period as one in which the historical arc of transportation safety considerably changed for the better, similar to the introduction of standards for seat belts, airbags, and electronic stability control technology."

NHTSA is currently finalizing its analysis of the data gathered as part of its year-long pilot program and will publish a research report on V2V communication technology for public comment in the coming weeks. The report will include analysis of the Department's research findings in several key areas including technical feasibility, privacy and security, and preliminary estimates on costs and safety benefits. NHTSA will then begin working on a regulatory proposal that would require V2V devices in new vehicles in a future year, consistent with applicable legal requirements, Executive Orders, and guidance. DOT believes that the signal this announcement sends to the market will significantly enhance development of this technology and pave the way for market penetration of V2V safety applications.

"We are pleased with the direction NHTSA is taking in terms of V2V technology," said Greg Winfree, Assistant Secretary for Research and Technology. "The decision to move forward comes after years of dedicated research into the overwhelming safety benefits provided by a connected vehicle environment."

V2V communications can provide the vehicle and driver with 360-degree situational awareness to address additional crash situations - including those, for example, in which a driver needs to decide if it is safe to pass on a two-lane road (potential head-on collision), make a left turn across the path of oncoming traffic, or in which a vehicle approaching at an intersection appears to be on a collision course. In those situations, V2V communications can detect threats hundreds of yards from other vehicles that cannot be seen, often in situations in which on-board sensors alone cannot detect the threat.

NHTSA has worked in close partnership in this research both with other DOT agencies, including the Office of the Assistant Secretary for Research and Technology and the Federal Highway Administration, and with several leading auto manufacturers and academic research institutions, who have invested significant resources into developing and testing V2V technology. The collaboration of government, industry and academia is critical to ensure V2V technology's interoperability across vehicles.

Find more more information on the Department's [vehicle-to-vehicle communication](#) technology research.

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