



SAFETY SPECTRUM COALITION

December 5, 2019

The Honorable Frank Pallone
Chairman
Committee on Energy and Commerce
U.S. House of Representatives
Washington, DC 20515

The Honorable Greg Walden
Ranking Member
Committee on Energy and Commerce
U.S. House of Representatives
Washington, DC 20515

Dear Chairman Pallone and Ranking Member Walden:

As member organizations of the Safety Spectrum Coalition, we are pleased to submit this letter for the House Energy and Commerce Subcommittee on Communications and Technology hearing on "Accountability and Oversight of the Federal Communications Commission."

We joined together in a diverse coalition representing safety advocates, highway users, the trucking industry, automakers, transportation technology companies, consumer groups, service providers, and state and local departments of transportation to promote safety on our roadways by preserving spectrum set aside for vehicle safety uses.

We are united in our opposition to the Federal Communications Commission's recent proposal to give away the 5.9 GHz spectrum reserved for safety uses. This change would very likely mean an end to the continued development of life-saving technologies and applications that could sharply curtail fatalities and injuries on our roadways.

The U.S. Department of Transportation and the National Highway Traffic Safety Administration tell us that the overwhelming majority – 94 percent – of crashes may include human error among causal factors. Safety regulators calculate that safety applications utilizing vehicle communications could eliminate or mitigate the severity of up to 80 percent of non-impaired crashes, such as those that occur at intersections or while changing lanes. This technology would enable vehicles to communicate with each other (vehicle-to-vehicle), with transportation infrastructure (vehicle-to-infrastructure), and to pedestrians and cyclists (vehicle-to-pedestrian) to avoid these crashes, prevent injuries, and above all save lives.

The FCC's action is set forth in a Notice of Proposed Rulemaking that makes no reference to essential automotive safety facts, including and especially the concept of the Basic Safety Message.

As a key enabler of V2X communications, Basic Safety Messages are transmitted from each car or truck to surrounding connected vehicles and traffic monitoring systems. The Basic Safety

Message contains information on where a car is, where it's headed, and how fast it is traveling – providing the foundation for an ecosystem of safety applications.

The Basic Safety Message is just the beginning of this important technology. As more vehicles, roadways, and infrastructure are equipped with these technologies, their capabilities will only grow – saving lives and money, and reducing congestion and emissions.

Uncertainty about the ability of manufacturers to use the spectrum in the future has already dampened investment and deployment of safety systems. In Wyoming, Colorado, Utah, New York City, Tampa, and in other states and localities across the country, V2X communications using DSRC are being deployed to enhance mobility and safety. As more information can be shared between vehicles and infrastructure in real time and without interference, personal transportation will become safer and more efficient.

As such, the Safety Spectrum Coalition has offered the following recommendations for the preservation and use of the Safety Spectrum.

- Government must preserve the full 75 MHz of the 5.9 GHz band for transportation safety, which, by any measure, is its highest and best use.
- Government should not pick winners and losers for the market and should be technology neutral.
- Government policy should ensure that all vehicles can talk to each other to achieve maximum safety benefits through network effects.
- Decisions should be based on data and facts, not conjecture. If the spectrum can be shared safely, let that be established by testing that proves its feasibility and not rush such a vitally important choice.

We appreciate the opportunity to offer our coalition views for the record, and the Committee's interest in this important issue.

Sincerely,

AAA

American Highway Users Alliance
American Traffic Safety Services Association
American Trucking Associations
Association of Global Automakers
Commercial Vehicle Training Association
Intelligent Transportation Society of America
Mothers Against Drunk Driving
Motor & Equipment Manufacturers Association
NAFA Fleet Management Association
National Safety Council
Peloton Technology, Inc.
Truck and Engine Manufacturers Association