

April 24, 2020

Via Email to FCC Electronic Comment Filing System
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Chairman Ajit Pai
Federal Communications Commission
445 12th Street, SW
Washington, D.C. 20054

Commissioner Jessica Rosenworcel
Federal Communications Commission
445 12th Street, SW
Washington, D.C. 20554

Commissioner Michael O’Rielly
Federal Communications Commission
445 12th Street, SW
Washington, D.C. 20554

Commissioner Geoffrey Starks
Federal Communications Commission
445 12th Street, SW
Washington, D.C. 20554

Commissioner Brendan Carr
Federal Communications Commission
445 12th Street, SW
Washington, D.C. 20554

ATTENTION: Ms. Marlene Dortch
Secretary, Federal Communications Commission

RE: ET Docket No. 19-138, Use of the 5.850-5.925 GHz Band;
Supplemental Reply Comments from American Highway Users Alliance

Dear Chairman Pai, Commissioners Rosenworcel, O’Rielly, Starks, and Carr:

On behalf of the American Highway Users Alliance (the Highway Users), a coalition of 300 organizations including companies, trade associations, safety advocacy groups, and motoring clubs that represent millions of motorists and serve as the united voice of the motoring public, we continue to strongly recommend that the Federal Communications Commission (FCC) reserve all 75 MHz of the 5.850-5.925 GHz Band for transportation safety purposes. The following supplemental reply comments in this docket¹ reflect late breaking news relating to the auto industry and their united effort to invest in the safety spectrum.

We are writing today to express our strong support for the auto industry and their commitment to deploy Vehicle-to-Everything (V2X) technologies in the United States. On April 23, the Alliance for Automotive Innovation (Auto Innovators) announced that they plan to deploy at least 5 million V2X radios on vehicles and roadway infrastructure over the next 5 years. The Highway Users are hopeful that the FCC will support this important effort through preserving this entire spectrum band for safety and

¹ See Notice of Proposed Rulemaking (NPRM), 85 Federal Register 6841 et seq. (February 6, 2020).

permitting Cellular V2X (C-V2X) technology to operate alongside Dedicated Short-Range Communication (DSRC).

Deployment of 5 million radios ensures that the spectrum will be utilized to maximize the safety benefits it offers and V2X safety improvements can finally be fully realized. This significant investment will allow every roadway user to have a safer driving experience and will help to prevent crashes. In 2018 alone, 36,560 people died, and 2.7 million individuals were injured on American roadways. This is simply unacceptable, and V2X could be the game changer we need to reduce crashes going forward. With the auto industry standing united to make this huge investment in these lifesaving technologies we are on the cusp of a turning point for roadway safety.

Furthermore, this agreement to deploy V2X on such a wide scale should dispel the notion that the safety spectrum isn't being utilized. Opening the safety spectrum to unlicensed Wi-Fi at this critical juncture is short-sighted and could compromise future success in reducing fatalities.

The auto industry is setting the United States on a path to become the global leader in connected and autonomous vehicles. This collective commitment to invest in V2X means that the 5.850-5.925 GHz Band would provide tremendous safety and societal benefits for the nation's traveling public.

Thank you for your time and consideration regarding these supplemental reply comments. The Highway Users continues to strongly recommend that the Commission continue to ensure that all of the 75 MHz in the 5.850-5.925 GHz Band be reserved for transportation safety purposes.

Sincerely,



Laura C. Perrotta, CAE
President & CEO

CC: The Honorable Elaine Chao
Secretary
United States Department of Transportation