



December 4, 2019

The Honorable Michael F. Doyle  
Chair  
Subcommittee on Communications and Technology  
Committee on Energy and Commerce  
United States House of Representatives  
Washington, DC 20515

The Honorable Robert E. Latta  
Ranking Member  
Subcommittee on Communications and Technology  
Committee on Energy and Commerce  
United States House of Representatives  
Washington, DC 20515

Dear Chairman Doyle and Ranking Member Latta:

ITS America has been a long-standing, ardent supporter of preserving the 5.9GHz band for transportation safety critical communications. Because of the importance of this issue to the association and our members, we have coordinated with the following organizations to provide statements in anticipation of the Subcommittee on Communications and Technology upcoming hearing entitled "Accountability and Oversight of the Federal Communications Commission."

**ITS America**

"In proposing to give away a majority of the 5.9GHz spectrum, the FCC has made a reckless decision that will put drivers, pedestrians and cyclists at risk – and it has done so without any data or analysis. The Commission must preserve the entire safety spectrum for today's and tomorrow's life-saving transportation technologies. Nothing is more important than saving tens of thousands of lives every year." *Shailen Bhatt, President & CEO*

**American Association of State Highway and Transportation Officials**

"State departments of transportation agree unanimously that the 5.9GHz band must remain dedicated to keeping people safe. If we are going to get to zero fatalities, we are going to need technologies like those that use the 5.9GHz band. Because a rigorous and objective analysis on interference impacts must be completed in order to consider any new plan for the 5.9GHz safety band, the FCC should delay its proposed rulemaking until it can work with the U.S. Department of Transportation and Secretary Elaine Chao on an appropriate path forward for the preservation of this important safety technology." *Jim Tymon, Executive Director*

**AAA**

"AAA supports preserving the entire 5.9GHz band for transportation safety communications. With more than 36,000 people killed in motor vehicle traffic crashes on U.S. roadways in 2018, vehicle-to-everything (V2X) technologies have the potential to connect vehicles, infrastructure, and people to support a safer transportation system."

**American Highway Users Alliance**

"The Highway Users is extremely concerned about the negative impact the FCC proposal would have on roadway safety into the future. There are over 36,000 individuals dying on our roads annually; that's approximately 100 people a day, and retaining the spectrum for vehicle-to-vehicle (V2V) and vehicle-to-infrastructure (V2X) communication will help ensure these technologies have adequate access to operate safely and drive down fatalities. To compromise roadway safety for faster Wi-Fi is simply unacceptable." *Laura Perrotta, President and CEO*

**American Trucking Associations**

"Because of its importance to highway safety, ATA strongly believes that all 75 MHz of the 5.9 GHz Safety Spectrum should remain protected for connected vehicle technology. We are disappointed that the FCC appears poised to cut into that spectrum for other purposes. With more than 36,000 people in 2018 losing



their lives in traffic fatalities, it is inconceivable and unacceptable that the FCC would consider slashing available transportation safety spectrum; which could have the greatest impact in reducing traffic fatalities moving forward. We urge the commissioners not to proceed with this proposal and to prioritize transportation safety over faster Wi-Fi.”

#### **Global Automakers**

“The decision to shrink the amount of airwaves devoted to auto safety is directly at odds with what federal highway safety officials are recommending and threatens to throw advancements in personal safety into reverse. Across the country today, V2X applications are being deployed on the 5.9 GHz safety spectrum. Choosing faster downloads over saving human lives is simply the wrong decision.” *Steve Gehring, Vice President of Vehicle Safety and Connected Automation*

#### **Institute of Transportation Engineers**

“ITE is extremely disappointed in the proposal advanced by FCC Chairman Pai to give away spectrum that has been set aside for life-saving communications between vehicles and other users. “ITE and its members are committed to saving lives and achieving the goals of Vision Zero. Reallocation of this spectrum is a short-sighted move that will significantly reduce the life-saving potential of connected and automated vehicles.” *Jeffrey F. Paniati, Executive Director and CEO*

#### **League of American Bicyclists**

"In the U.S., one in every three people who die in motor vehicle crashes isn't in a car--they are biking, walking, using a wheelchair or on a motorcycle. These deaths are preventable and due to years of prioritizing traffic speed over safety in transportation engineering. It is critical to preserve the 5.9 GHz safety spectrum so that the U.S. does not make a similar mistake by prioritizing faster Wi-Fi speed over transportation safety." *Bill Nesper, Executive Director*

#### **Motor & Equipment Manufacturers Association**

“It is critical that 5.9 GHz spectrum remain reserved for the transportation industry. This spectrum must be preserved as intended and maintained in its entirety to allow for full deployment of critical life-saving technologies. We cannot risk losing the Vehicle Safety Spectrum, because once it is lost, it will be impossible to reclaim for vehicle safety purposes.”

#### **NAFA Fleet Management Association**

“NAFA Fleet Management Association and professional vehicle fleet managers are very concerned about the Federal Communication Commission’s intent to reallocate the 5.9 GHz spectrum. The National Highway Traffic Administration’s analysis of two potential applications, “intersection movement assist” (IMA) and “left turn assist” found there could be a 50-percent reduction, on average, in crashes, injuries, and fatalities for just these two applications. These technologies present a significant tool for fleet managers to go beyond managing risks to actively eliminating accidents and fatalities through the avoidance of operator error by other drivers on the road.”

#### **Peloton Technology**

“The Peloton Technology view is that the entire 75 MHz band must be protected for transportation safety purposes, and that the NPRM scheduled for December 12, 2019 should be withheld at least until the FCC and USDOT agree to a path forward for 5.9GHz. Preservation of the band is critical for the future of the nation’s transportation safety, and uncertainty has had a chilling effect on investment. We look forward to working constructively with the U.S. Department of Transportation, FCC, state governments, industry, and other stakeholders to resolve this critical transportation safety matter.”



**Truck and Engine Manufacturers Association (EMA)**

“Heavy truck manufacturers are taking active steps toward deployment of DSRC in the 5.9 GHz band and believe that the significant benefits of V2X can only be achieved if all seven channels of the band are protected for transportation communications. Additionally, FCC and DOT should conduct rigorous testing, including real-world testing, to validate that C-V2X signals in the 5.9 GHz band will not interfere with DSRC messages.”

We appreciate the opportunity to offer our views for the record and the Subcommittee’s interest in this important issue.

Sincerely,

A handwritten signature in black ink, appearing to read "S. Bhatt".

Shailen P. Bhatt  
President and CEO  
Intelligent Transportation Society of America

Cc: House Communications and Technology Subcommittee  
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