

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:

On behalf of the Association of Global Automakers (“Global Automakers”), I am pleased to provide the following letter for the record of the House Committee on Energy and Commerce Subcommittee on Communications and Technology hearing entitled “Accountability and Oversight of the Federal Communications Commission.” Global Automakers represents the U.S. operations of international motor vehicle manufacturers, original equipment suppliers, and other automotive-related companies and trade associations. Our companies are technology leaders, bringing a wide range of fuel-efficient technologies for gasoline, plug-in, battery-electric, and fuel cell electric cars and light trucks to market, and innovating in the areas of connected and automated technologies as well.

The Federal Communications Commission is set to engage in a rulemaking that would both limit and irreversibly harm progress toward the advancement of life-saving connected vehicle technology in the United States. The U.S. Department of Transportation and the National Highway Traffic Safety Administration tell us that the overwhelming majority – 94 percent – of crashes are due to driver error.

As part of the effort to reduce highway fatalities and injuries, spectrum in the 5.9 GHz band was set aside for auto safety uses and applications, and we commonly refer to the band as the Safety Spectrum.

The need for the Safety Spectrum is as crucial today as the day it was reserved for safety. Safety regulators calculate that safety applications such as those using Dedicated Short Range Communications (DSRC) and Cellular Vehicle to Everything Communications (CV2X) on the safety band could eliminate or mitigate the severity of up to 80 percent of non-impaired crashes, including crashes at intersections or while changing lanes by enabling vehicles to communicate with each other (V2V) and with the transportation infrastructure (V2X) to avoid crashes and save lives.

As an example, each car or truck would transmit what’s called a Basic Safety Message to surrounding connected vehicles and traffic monitoring systems. The basic message contains information on where a car is, where it’s headed, and how fast it is traveling. If it’s about to go

through a red light because the driver is distracted, other cars in the area, and the traffic signaling system, can warn drivers or take other steps to avoid a collision.

That's just the beginning of this important technology. As more vehicles and roadways are equipped with these technologies, their capabilities will only grow – saving lives and money, while also reducing congestion and emissions.

In the FCC's Notice of Proposed Rulemaking, there is no reference to the life-saving potential of the Basic Safety Message, the true status of deployment of DSRC systems, and the FCC's own record regarding the use of the full band for safety communications.

The experience of at least one manufacturer offers a case study in how the FCC has already slowed auto safety improvements.

On April 16, 2018, Toyota announced that it would begin deploying DSRC on vehicles sold in the U.S. starting in 2021. On May 10, 2018, two FCC commissioners wrote the company with a warning that the company should be careful “when committing capital expenditures to DSRC technology.” The following April, Toyota announced a pause in deployment, citing uncertainty about federal government support for preserving the Safety Spectrum.

FCC commissioners now appear to criticize manufacturers for doing exactly what the agency wanted—*not* investing in DSRC—and then using that as the justification for reducing the amount of spectrum available for DSRC.

In New York City, Salt Lake City, Colorado, and in other states and localities across the country, V2X communications using DSRC are being deployed to enhance mobility and safety.

According to the Department of Transportation, “There are more than 70 active deployments of V2X (vehicle to everything) communications using the 5.9 GHz band for cooperative applications. More than 18,000 vehicles are deployed with aftermarket V2X communications devices and over 1,000 infrastructure V2X devices have been installed at the roadside in 25 states.” The FCC's current rulemaking proposal would limit the ability for these, and indeed, all states and localities to leverage technology to improve their transportation systems.

The Safety Spectrum is also a key component in maintaining American leadership in the development of technologies that could lead to safe, driverless transportation. As more information can be shared between vehicles and the infrastructure, in real time and without interference, personal transportation will become safer and more efficient.

An unusually broad coalition, consisting of highway users, the trucking industry, auto manufacturers and, significantly, the American Automobile Association, state and local departments of transportation, the National Safety Council, and Mothers Against Drunk Driving, has come together in opposition to the FCC's proposed spectrum policy.

That coalition has offered principles for use of the safety spectrum.

- **Government must preserve the full 75MHz of the 5.9 GHz band for auto 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.

The FCC proceeding should be rebooted before it further sets back the cause of auto safety. We welcome the support of concerned Members of the Committee in this effort.

Thank you for the opportunity to submit this letter for the hearing record.

Sincerely,



Steve Gehring
Vice President of Vehicle Safety and Connected Automation
Association of Global Automakers