

November 26, 2018

Ms. Marlene H. Dortch  
Secretary  
Office of the Secretary  
Federal Communications Commission  
445 12th Street SW  
Washington, DC 20554

SUBJECT: FCC Request for Comment on 5.9 GHz Phase I Testing Data (DA/FCC # DA-18-1111); [Docket/RM 13-49]

Dear Ms. Dortch:

The American Association of State Highway and Transportation Officials (AASHTO) appreciates the opportunity to provide comments to the Federal Communications Commission (FCC or Commission) on the results from Phase I testing of the impacts of Unlicensed National Information Infrastructure (U-NII or Unlicensed) device use within the 5.850 – 5.925 GHz Dedicated Short-Range Communications (DSRC) band. Representing all 50 states, the District of Columbia, and Puerto Rico, AASHTO serves as a liaison between state departments of transportation and the federal government.

AASHTO members, while broadly acknowledging the various observations from the test results outlined in the Commission’s report, unequivocally support adherence to the three-phased testing plan agreed upon by the Department of Transportation (DOT), the Department of Commerce (Department) and the Commission<sup>1</sup>. Specifically:

- AASHTO recognizes the importance of validating operational performance and effectiveness of safety-critical devices based on comprehensive and robust field verification of interference testing. To this end, AASHTO has expressed its support for USDOT’s National Highway Traffic Safety Administration (NHTSA) leading the Phase II testing efforts as outlined in Section 6 of the DOT’s testing plan<sup>2</sup>.
- AASHTO recognizes the need to accelerate the time line for performing Phase II and III testing given the delay in releasing Phase I results. To this end, AASHTO is willing to assist USDOT-NHTSA in identifying operational field devices and corridors in real world deployments that could serve as “test-cases” in Phase II of the field testing.
- Lastly, AASHTO maintains that policy decisions related to spectrum reallocation be made only after all three phases of testing are completed and the results are conclusive,

<sup>1</sup> Letter to Congress proposing the test plan: [https://apps.fcc.gov/edocs\\_public/attachmatch/DOC-337251A1.pdf](https://apps.fcc.gov/edocs_public/attachmatch/DOC-337251A1.pdf)

<sup>2</sup> DSRC-Unlicensed Device Analysis Plan, v4.7:

[https://www.its.dot.gov/research\\_archives/connected\\_vehicle/pdf/DSRC\\_Analysis\\_Planv4Dec2017.pdf](https://www.its.dot.gov/research_archives/connected_vehicle/pdf/DSRC_Analysis_Planv4Dec2017.pdf)

and have been made available for public review. This aligns with USDOT's position as outlined in its recently released AV 3.0 document<sup>3</sup>. While the Phase I tests may have shown that unlicensed devices do not interfere with DSRC communications, it is important to qualify that these tests were performed in a controlled environment and the results do not always translate to the real world.

The Commission's statement accompanying the release of the test results referring to "the limited deployment of DSRC in discrete circumstances," is notably inaccurate. It fails to acknowledge the efforts of 26 states who, in response to AASHTO's Signal Phase and Timing (SPaT) Challenge and in an effort to improve transportation safety, committed significant resources to deploying DSRC-enabled equipment at more than 200 traffic signals, with more than 2,100 additional signals programmed for installation in the near future, likely before the end of Phase III. State and local transportation agencies have invested millions of dollars in DSRC, and they do not want the investment in this life-saving technology to be wasted. Therefore, there is an obligation on the part of the Commission to ensure that the effectiveness of the spectrum dedicated for transportation safety and mobility applications is not compromised.

If you have any questions, please contact Venkat Nallamothe, Program Manager for AASHTO's Frequency Coordination Program, at [vnallamothe@aaashto.org](mailto:vnallamothe@aaashto.org) or 202-624-5497.

Sincerely,



Carlos M. Braceras  
President, American Association of State Highway and Transportation Officials  
Director, Utah Department of Transportation

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<sup>3</sup> Preparing for the Future of Transportation: Automated Vehicles 3.0 (AV 3.0):  
<https://www.transportation.gov/sites/dot.gov/files/docs/policy-initiatives/automated-vehicles/320711/preparing-future-transportation-automated-vehicle-30.pdf>