August 19, 2019

The Honorable Ajit Pai
Chairman
Federal Communications Commission
445 12th Street, Southwest
Washington, DC 20554

Dear Chairman Pai:

As Members of the American Association of State Highway and Transportation Officials (AASHTO) representing the state departments of transportation (state DOTs) of all 50 states, the District of Columbia, and Puerto Rico, we urge you to continue our nation’s commitment to improving transportation safety by reserving the 5.9 GHz wireless spectrum for this critical purpose. The top priority for the state DOTs and AASHTO has been—and will always remain—the safety of all transportation system users. The loss of 36,750 lives last year on our nation’s highways and streets demands that we act boldly. To this end, connected vehicles (CV) utilizing Vehicle-to-Everything (V2X) communication in the 5.9 GHz spectrum will save lives by creating a seamless, cooperative environment that significantly improves the safety of our transportation system.

As infrastructure owners and operators of the nation’s surface transportation infrastructure, state and local transportation agencies are at the core of creating the optimal CV environment. While automakers and device manufacturers will dictate availability of vehicular equipment, transportation agencies will control the deployment and operation of roadside infrastructure and the incorporation of CV technologies into infrastructure applications. Together, the public and private sectors have already invested hundreds of millions of dollars to develop and deploy lifesaving CV technologies in the 5.9 GHz spectrum.

State DOTs fully recognize that there is no current agreement among the transportation industry on which particular technology will be used to broadly deploy V2X applications. That being said, the current debate among stakeholders in the transportation industry on how best to use the 5.9 GHz spectrum should not be an excuse to open the spectrum for non-transportation safety purposes; rather, by preserving the spectrum, it will facilitate the transportation industry to agree on the best technology solution to broadly deploy V2X applications.

In closing, state DOTs understand that a CV environment holds the potential to support a fundamental advancement in ensuring the safety of our nation’s surface transportation system. And in order for this promising future to become a reality, the 5.9 GHz spectrum must be preserved for transportation safety purposes.
If you would like to discuss the issues raised in this letter, please contact Joung Lee, AASHTO’s Policy Director, at 202-624-5818 or jlee@aashto.org.

Sincerely,

cc:

Carlos Braceras  
President, AASHTO  
Executive Director. Utah Department of Transportation

Jim Tymon  
Executive Director  
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John R. Cooper  
Transportation Director  
Alabama Department of Transportation

Shoshana Lew  
Executive Director  
Colorado Department of Transportation

John MacKinnon  
Commissioner  
Alaska Department of Transportation and Public Facilities

Joseph Giulietti  
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Jennifer Lynn Cohan  
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Bob Franzoia  
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Tim J. Gatz  
Secretary of Transportation/Executive Director  
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Paul R. Mather  
Interim Deputy Director  
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Leslie Richards  
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cc:  
The Honorable Michael O’Rielly, Commissioner  
The Honorable Brendan Carr, Commissioner  
The Honorable Jessica Rosenworcel, Commissioner  
The Honorable Geoffrey Starks, Commissioner