

April 23, 2020

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

Re: ET Docket No. 19-138, FCC 19-129 “Use of the 5.850-5.925 GHz Band”

Dear Ms. Dortch

The American Association of State Highway and Transportation Officials (AASHTO) is pleased to submit a letter of support for the announcement made by the Alliance for Automotive Innovation (Auto Innovators) and their commitment to the full build-out of connected vehicle technologies (V2X) using the entire 75 MHz of the 5.9 GHz 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.

On April 23, 2020, the Alliance for Automotive Innovation announced their commitment to the full build-out of connected vehicle technologies (V2X) using the entire 75 MHz of the 5.9 GHz band. AASHTO enthusiastically supports the Auto Innovators’ pledge to deploy five million connected vehicle radios in passenger vehicles and on the infrastructure within five years. This build-out of connected vehicle technologies reflects a watershed moment for roadway safety: a unified industry is making substantial commitment of resources to V2X. This major action should dispel any notion that the transportation industry will not deploy connected vehicle technologies or that the full 75 MHz of the 5.9 GHz band will not be used. The deployment of five million connected vehicle radios ensures that the network effects necessary to maximize the safety benefits of V2X will be achieved. The build-out commitment made by the Auto Innovators is a leap forward in realizing the FCC and USDOT’s joint vision for V2X, and will significantly advance U.S. global leadership in connected and autonomous vehicles.

This commitment by the Auto Innovators also establishes much-needed certainty for the state DOTs as infrastructure owners and operators responsible for the build-out of infrastructure-based V2X components. With this commitment, the state DOTs will be well-positioned to lead the effort to continue the deployment of the necessary roadside infrastructure to make V2X work. In fact, AASHTO has been helping to lead this effort since 2016 when AASHTO, in cooperation with the CAT Coalition, ITE and ITS America, challenged Infrastructure Owners and Operators (IOOs) to begin deploying connected vehicle roadside infrastructure. Known as the “SPaT¹ Challenge”, this now well-known initiative stands as evidence of the support of connected vehicle deployment among IOOs. Knowing the huge safety and mobility potential of connected vehicle deployment, the IOOs deployed 670 roadside units broadcasting SPaT and MAP

¹ SPaT: Signal, Phase, and Timing

messages with another 3325 roadside units planned for near-term deployment. These deployments span 54 distinct locations in 27 states and involve state and local DOTs of all sizes. IOOs around the country are anxious for connected vehicle technology to be a reality, and, as evidenced by their response to the SPaT Challenge, are ready to take action once the uncertainties are removed.

AASHTO commends Auto Innovators for their commitment to the deployment of connected vehicle technologies. AASHTO, working with other industry partners, is committed to helping lead the deployment of the needed infrastructure-based equipment. However, there is one hurdle that we must overcome and that is the current FCC Notice of Proposed Rulemaking to reallocate a significant portion of the current 5.9 GHz band for unlicensed use. Given this announcement by Auto Innovators, we trust the FCC will make the right decision and preserve the entire band for transportation safety purposes.

If you would like to discuss the issues raised in this letter, please contact Matthew Hardy, Ph.D., AASHTO's Program Director for Planning and Performance Management at (202) 624-3625.

Sincerely,

A handwritten signature in black ink that reads "Patrick K. McKenna". The signature is written in a cursive, flowing style with a long, sweeping tail on the "a".

Patrick K. McKenna
President, American Association of State Highway and Transportation Officials
Director, Missouri Department of Transportation