

April 23, 2020

The Honorable Elaine Chao
Secretary
United States Department of Transportation
1200 New Jersey Ave SE
Washington, D.C. 20590

The Honorable Ajit Pai
Chairman
Federal Communications Commission
445 12th Street SW
Washington, D.C. 20584

Dear Secretary Chao and Chairman Pai:

Vehicle-to-everything (“V2X”) communication technologies promise to deliver significant safety and societal benefits to the American public, including reducing automotive crashes and fatalities and producing economic, environmental, and transportation efficiencies.

Recognizing the opportunity for these benefits, automotive manufacturers have already deployed or announced deployments utilizing the 5.9 GHz Safety Spectrum band in the United States (U.S.) and around the world. These commitments and efforts represent a clear desire and intent by the automotive industry to use the spectrum and highlight the progress that has been made towards the widespread deployment of V2X. In fact, the companies with deployed or announced deployments account for over 60% of the automotive market share in the United States. It is noteworthy that this activity has occurred despite uncertainty from regulators about future use of the 5.9 GHz band. Specifically:

- General Motors deployed dedicated short-range communication (DSRC) in its MY 2017-2019 Cadillac CTS vehicle, and also announced intentions to offer V2X in a future Cadillac crossover before extending the technology to all Cadillac models in the United States.
- Ford has committed to deploying cellular vehicle-to-everything (C-V2X) starting in the 2022 calendar year in both the U.S. and China markets.
- Honda, in partnership with the Ohio Department of Transportation (DOT), is deploying the highest-density V2X environment of its kind with the U.S. State Route 33 Smart Mobility Corridor.
- Toyota has been a global leader on V2X, deploying more than 100,000 DSRC-equipped Toyota and Lexus vehicles in Japan.
- Volkswagen installed DSRC for V2X capabilities, such as assisted driving and collective intelligence, in its new Golfs in Europe.
- According to BMW research, C-V2X should be ready to begin integration into the next generation of vehicle communication platforms.
- Audi, in partnership with the Virginia DOT, announced a pilot program for C-V2X deployments beginning in the third quarter of 2020.

However, to maintain this progress and to achieve widespread deployment of V2X technologies, automotive manufacturers need certainty that all 75 MHz of the 5.9 GHz band will be available for V2X. V2X deployments will ultimately be dependent upon a known and certain technological eco-system in

which protection from interference is assured and interoperability with other transportation users is defined. We recognize that the FCC's recent action to allow wireless internet service providers (WISPs) to operate in the lower 45 MHz of the 5.9 GHz band is temporary – expiring May 26, 2020 – and intended only to provide relief due to the COVID-19 pandemic. We also note the Commission's announcement that it will make available 1200 MHz of spectrum for unlicensed usage in the 6 GHz band. As noted by Chairman Pai, this action will accommodate the demand for Wi-Fi and advance the FCC's goal of realizing 5G. Further re-allocation of the 5.9 GHz band for Wi-Fi is not necessary and undercuts the value of increasing public safety on our nation's roadways.

The automotive industry is poised to continue deploying V2X technologies in the 5.9 GHz band. If the FCC assures that all 75 MHz of spectrum will be maintained for transportation safety and takes action to permit cellular vehicle-to-everything (C-V2X) and dedicated short-range communication (DSRC) to co-exist in the 5.9 GHz band, we will commit to the following industry-wide build out requirement: **Within 5 years, a total of at least 5 million radios on vehicles and roadway infrastructure will have been deployed, including any previous V2X deployments.**

This collective, industry-wide commitment will incentivize and expedite deployments in the 5.9 GHz band. We fully expect that following this 5-year commitment, consumer demand for V2X technologies will continue to grow. Widespread deployment of V2X will increase the safety on our nation's roadways, bolster our global competitiveness, and provide considerable economic and societal benefits.

The auto industry stands ready to make these significant V2X deployment commitments once the FCC makes the corresponding adjustments in the 5.9 GHz band, including not proceeding with a reallocation of 45 MHz for unlicensed Wi-Fi. We ask the FCC to continue working with the U.S. DOT to promote the best and most efficient use of the 5.9 GHz spectrum band for intelligent transportation system applications and to take the necessary steps to realize the safety, economic and societal benefits of V2X technologies.

Sincerely,



John Bozzella
President and CEO

Cc: Douglas Kinkoph, National Telecommunications and Information Administration
Michael O'Rielly, Federal Communications Commission
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