

October 28, 2019

The Honorable Ajit Pai, Chairman  
Federal Communications Commission  
445 12<sup>th</sup> St. SW  
Washington, D.C. 20554

Re: ET Docket No. 13-49, GN Docket No. 18-357

Dear Chairman Pai,

The undersigned safety organizations urge the Federal Communications Commission (FCC) to help save lives on our roadways. According to the National Highway Traffic Safety Administration (NHTSA), in 2017, 37,133 people died in motor vehicle crashes.<sup>1</sup> That equates to over 100 people a day dying on American roads, and these deaths are preventable. One way to make large, sustained gains in reducing roadway deaths and injuries is through technology, and therefore, we urge you to preserve the 5.9 GHz band for transportation safety.

With the tremendous potential to improve transportation safety and the growth in demand for vehicle-to-everything (V2X) services, it is essential that the entire 5.9 GHz band – all seven channels – be retained for V2X, and that all measures are taken to smooth the path for deployment. Unless and until the FCC and the U.S. Department of Transportation complete the agreed-upon three phases of testing to inform DSRC/Wi-Fi sharing and prove that safety will not be compromised, these safety innovations must have dedicated spectrum to ensure they work properly every time, without signal interference. Harmful interference from unlicensed devices sharing the same band could affect the speed at which a V2X message is delivered or even prevent delivery entirely. As new technology continues to be deployed, now is the time for the FCC to commit to protecting the progress and investment made in V2X communications. Sharing or rechanneling the 5.9 GHz band could nullify progress already made, unnecessarily delay implementation, devalue prior 5.9 GHz technology investment, and most importantly could lead to the unnecessary loss of lives.

We have the potential to save thousands of lives if the dedicated spectrum is maintained for its original use. In order to accelerate the deployment of new life-saving technologies, we urge you and your colleagues to maintain the entire 5.9 GHz band for transportation safety.

Sincerely,

AAA  
Advocates for Highway and Auto Safety  
American Association of Motor Vehicle  
Administrators  
American Association of State Highway and  
Transportation Officials  
Center for Auto Safety  
Consumer Reports  
Governors Highway Safety Association

Insurance Institute for Highway Safety  
International Association of Fire Chiefs  
Institute of Transportation Engineers  
MADD  
National Association of State EMS Officials  
National Safety Council  
National Sheriffs' Association  
Safe Kids Worldwide

cc: Commissioner Michael O'Rielly  
Commissioner Brendan Carr  
Commissioner Jessica Rosenworcel  
Commissioner Geoffrey Starks  
Aaron Goldberger

Erin McGrath  
Will Adams  
Umair Javed  
William Davenport

---

<sup>1</sup> <https://www.nhtsa.gov/press-releases/us-dot-announces-2017-roadway-fatalities-down>