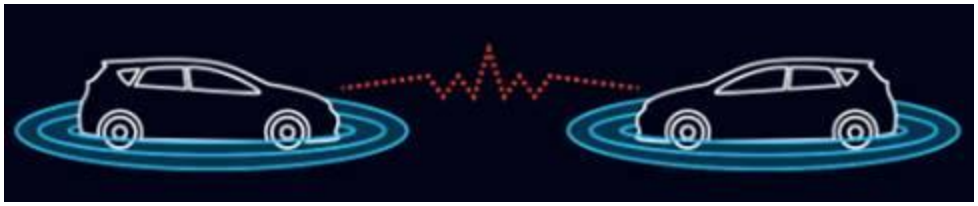

# SAFETY SPECTRUM COALITION

April 12, 2017

Docket Management Facility
M-30
U.S. Department of Transportation
National Highway Traffic Safety Administration
1200 New Jersey Ave. SE, West Building
Ground Floor, Room W12-140
Washington, D.C. 20590

Re: Docket No. NHTSA-2016-0126

Dear Docket Manager:

The Safety Spectrum Coalition appreciates the opportunity to comment on the National Highway Traffic Safety Administration's (NHTSA) January 12, 2017 notice of proposed rulemaking on "Federal Motor Vehicle Safety Standards; V2V Communications." The Safety Spectrum Coalition represents a broad group of industries, highway users, and transportation technology, consumer, and safety advocates that support and promote the need for Dedicated Short Range Communications (DSRC) technology, supported by the 5.9 GHz safety spectrum band. DSRC vehicle-to-vehicle communications (V2V) can save lives and significantly reduce the injuries, damage and congestion caused by motor vehicle crashes. The Safety Spectrum Coalition strongly supports this proposed rule establishing a Federal Motor Vehicle Safety Standard (FMVSS) requiring V2V capability through DSRC technology in cars and light trucks.

The advancements represented by DSRC are especially timely and important. Preliminary 2016 data from the National Safety Council estimates that as many as 40,000 people died as a result of motor vehicle crashes last year. That marks a 14% increase over 2014, the most dramatic two-year escalation since 1964.[1] This would mean that 2016 may have been the deadliest year on the nation's roads since 2007. An estimated 4.6 million roadway users were injured seriously enough

[1] National Safety Council, Motor Vehicle Deaths in 2016 Estimated to be Highest in Nine Years (available at http://www.nsc.org/Connect/NSCNewsReleases/Lists/Posts/Post.aspx?ID=180)

to require medical attention in 2016, and the estimated cost to society was $432.5 billion.[2] According to calculations by the NHTSA, just four DSRC V2V applications could avoid or mitigate 89% of light duty vehicle crashes and 85% of their associated costs, saving thousands of lives, avoiding millions of injuries, and yielding billions of dollars in cost savings.[3] By any measure, the benefits of DSRC vastly exceed the costs. The urgency of this proposed rulemaking is underscored by the fact that this technology is ready now.

This proposed rule represents the culmination of over a decade of work and millions of dollars of investment by the federal government, state governments, research institutions, technical standards organizations, technology companies and automakers. Whereas in the past, progress in vehicle safety was measured by improvements in surviving vehicle crashes, DSRC V2V technology advances traffic safety by radically improving the capabilities of vehicles to coordinate movements and thereby avoid crashes altogether. To achieve this goal, engineers have developed a robust, interoperable, and secure communications protocol within DSRC to allow cars and trucks to transmit secure and private data directly from one vehicle to another at the rate of ten times per second. DSRC is a unique technology that allows cars to wirelessly connect to other road users and the surrounding infrastructure to effectively "see" around corners and through vehicles to achieve greater 360-degree situational awareness to inform or warn the driver to avoid a crash.

Based on years of research and development, the Safety Spectrum Coalition strongly favors using channel 172 to support V2V basic safety message transmissions. Channel 172 is ideally situated to have a "guard band" between V2V operations and devices operating in lower channels, as well as sufficient distance between it and the high-power public safety channel at channel 184. While other channels will be needed to support the development of a broad ecosystem of safety applications, this channel is optimally suited for ensuring a clean operational environment to reliably transmit critical vehicle safety messages.

NHTSA's proposed rule provides the regulatory framework and certainty necessary to drive not only substantial and rapid light-duty fleet deployment of V2V technology, but also spur innovation, competition, and deployment in the aftermarket and infrastructure industries to bring even further safety benefits to our roads. While the DSRC V2V rulemaking and the subsequent deployment of various V2V applications are a critical step, it is important to understand that DSRC technology will create a new wireless transportation application ecosystem through all seven channels in the 5.9 GHz band that will enable safer, smarter, and more efficient travel. The safety-critical applications in development for all DSRC channels will support not only V2V, but also vehicle-to-infrastructure and vehicle-to-pedestrian communications, as well as DSRC

[2] *Id.*
[3] *See* Federal Motor Vehicle Safety Standards; V2V Communications, 82 Fed. Reg. 3854, 3863 (Jan. 12, 2017) (the V2V NPRM).

applications to support automated features and highly automated driving.

Finalizing this proposed rule and protecting from harmful interference the 5.9 GHz band currently dedicated to DSRC will provide stakeholders throughout the transportation industry with the necessary federal standards and certainty needed to increase deployments of, and uses for, this revolutionary technology. The Safety Spectrum Coalition supports efforts under way to test spectrum sharing in order to determine if unlicensed devices such as Wi-Fi can safely share the 5.9 GHz band with DSRC operations. However, we firmly believe that sharing testing and any potential sharing plan should work around DSRC operations in the band and not slow DSRC deployment. Any sharing arrangements that would require rechanneling the band would hold up the implementation of DSRC and the establishment of safety protocols, effectively relegating vehicle safety to a secondary concern. We urge NHTSA to remain engaged with the FCC at this critical juncture to ensure that the safety benefits of DSRC can be realized.

There are clear and immediate safety benefits from requiring DSRC technology in all new light vehicles. The more cars on the road that can be connected, the greater the safety benefits. This regulation will help create a new transportation ecosystem in which vehicles will communicate with each other and their surroundings to improve road safety. The rulemaking should move forward expeditiously so that the V2V FMVSS can become a reality as soon as possible. Every day delayed risks a life that could have been saved with deployment of this revolutionary technology.

Sincerely,

AAA
American Highway Users Alliance
American Traffic Safety Services Association
American Trucking Associations
Association of Global Automakers
Commercial Vehicle Training Association
Intelligent Transportation Society of America
Motor & Equipment Manufacturers Association
NAFA Fleet Management Association
National Safety Council