

ITS AMERICA



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ASCE
AMERICAN SOCIETY OF CIVIL ENGINEERS



AMERICAN ASSOCIATION
OF STATE HIGHWAY AND
TRANSPORTATION OFFICIALS
AASHTO



February 9, 2015

The Honorable Fred Upton
Chair, Committee on Energy and Commerce

The Honorable Frank Pallone
Ranking Member, Committee on Energy and Commerce

The Honorable John Thune
Chair, Committee on Commerce, Science and Transportation

The Honorable Bill Nelson
Ranking Member, Committee on Commerce, Science and Transportation

We the undersigned associations, representing automobile manufacturers, motorists, state highway and transportation officials and the intelligent transportation community, write to you today to respectfully request your opposition to the Wi-Fi Innovation Act. Introduced last Congress, this bill would open up previously dedicated auto safety spectrum to unlicensed Wi-Fi users and jeopardize the implementation of a safety critical crash avoidance system that has the potential to significantly reduce traffic crashes and assist in reducing greenhouse gas emissions. While this legislation currently does not have a bill number, we anticipate its re-introduction soon.

Over the past two decades the auto industry, the U.S. Department of Transportation (USDOT), the American Association of State Highway and Transportation Officials (AASHTO), the Intelligent Transportation Society of America (ITS America) and its member companies and university research centers such as the University of Michigan Transportation Research Institute (UMTRI), have invested significant resources and over a billion dollars researching, developing and testing a vehicle-to-vehicle (V2V) and vehicle-to-infrastructure (V2I) communication system collectively referred to as V2X.

The V2X communication system is comprised of seven safety channels utilizing 75 MHz of spectrum located in the upper 5.8 GHz and lower 5.9 GHz band. This system enables vehicles to communicate with each other and with the world around them (traffic signals, bicycles, pedestrians, buses, trucks and even mobile phones) providing real-time 360 degree high-speed situational safety warnings allowing drivers to respond or in some cases the vehicle to respond for them. Happening ten times per second, these communications must be free of any signal interference. One miscommunication or blocked signal could cause a crash and, possibly, serious injuries or deaths.

The Wi-Fi Innovation Act would require the Federal Communications Commission (FCC) to open up the reserved 75 MHz of spectrum to unlicensed Wi-Fi use and eliminate the proper safety mechanisms provided to the FCC to ensure the protection of the V2X communication system. The opening of this spectrum without proper interference testing would reverse decades of efforts. It would also negate the ongoing efforts of the various constituencies who are exploring whether a technical solution exists to allow sharing of the spectrum. These wide ranging constituencies include automakers, the Wi-Fi community, the FCC, the U.S. DOT and innovators from across the transportation, technology and research communities. This collaborative process should proceed without pre-emptive legislation that sets arbitrary deadlines and restrictive parameters.

Connected vehicle technology may significantly impact the future of auto safety and must be protected. In fact, the National Highway Traffic Safety Administration (NHTSA) has initiated a rulemaking to establish standards for this technology to operate in unison in all vehicles. They estimate that at full penetration, V2X technology could prevent or mitigate up to 80 percent of the annual unimpaired vehicle crashes saving thousands of lives and reducing the \$871 billion cost to our nation's economy each year. 'Talking cars' that avoid crashes and reduce traffic congestion and pollution are being deployed today as tests continue. That is why we ask for you to oppose any legislation, such as the Wi-Fi Innovation Act, that could set the program back and risk the implementation of this life saving technology and safety system.

Thank you for your consideration of our views. Please do not hesitate to reach out to us for further information or to answer any questions.

Sincerely,

Thomas E. Kern
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(ITS America)

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Roger A. Wentz, CAE
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cc: Members of the House and Senate