ALLIANCE FOR AUTOMOTIVE INNOVATION

July 5, 2024

Marlene Dortch, Esq.
Secretary
Federal Communications Commission
45 L Street NE
Washington, DC 20554

RE: Use of the 5.850-5.925 GHz Band (ET Docket 19-138)

The Alliance for Automotive Innovation ("Auto Innovators"), which represents the automotive ecosystem in the U.S., including automakers, suppliers, battery makers, and technology companies, hereby submits comments to the Federal Communications Commission ("the Commission") on the National Telecommunications and Information Administration's ("NTIA") recommendations to adopt power limit rules for cellular-vehicle-to-everything ("C-V2X") on-board units ("OBUs") that include provisions for the optional use of geofencing techniques.

Auto Innovators acknowledges that the protection of federal radiolocation systems remains a key issue whose resolution can facilitate progress on the Commission's Second Report and Order for the use of the 5.895-5.925 GHz band ("Upper 5.9 GHz band"). The finalization of technical rules for C-V2X operation in the Upper 5.9 GHz band remains of paramount importance to the automotive industry to improve transportation and vehicular-safety related applications. Importantly, a Second Report and Order containing final technical rules for C-V2X operation in the Upper 5.9 GHz band will resolve some of the remaining regulatory uncertainty that has delayed widespread deployment of C-V2X technology, while also helping to ensure that the U.S. remains competitive in global automotive innovation. Auto Innovators appreciates that NTIA and the Commission are seeking to identify a pathway through optional geofencing for OBUs to operate with a less restrictive equivalent isotropically-radiated power ("EIRP") outside of federal radiolocation system coordination zones. We support a less restrictive EIRP option and look forward to working with the Commission to minimize the complexity and cost to automotive companies of such a geofencing pathway to operating at higher power levels.

The Commission's prompt finalization of a Second Report and Order on the 5.9 GHz band will serve the public interest by providing automotive ecosystem stakeholders with the regulatory certainty needed to support deployment of cutting-edge C-V2X safety applications at scale. Rapid finalization will also help address a growing U.S. automotive safety crisis, maintain American competitiveness in automotive innovation, and encourage harmonized global deployment of C-V2X technologies in the Upper 5.9 GHz band.

Sincerely,

Tara Hairston
Senior Director, Technology Policy