



SUBMITTED ELECTRONICALLY

March 18, 2019

Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, SW
Washington, D.C. 20554

Re: *Unlicensed Use of the 6 GHz Band, Expanding Flexible Use in the Mid-Band Spectrum Between 3.7 and 24 GHz*, Notice of Proposed Rulemaking, Federal Communications Commission No. 18-147, ET Docket No. 18-295, GN Docket No. 17-183 (October 24, 2018)

Dear Ms. Dortch:

The Alliance of Automobile Manufacturers (“Auto Alliance” or “Alliance”)¹ is pleased to submit reply comments in response to the Federal Communications Commission’s (“FCC” or “Commission”) Notice of Proposed Rulemaking (“NPRM”) seeking input on proposed rules that will promote new opportunities for unlicensed use in portions of the 1200 megahertz of spectrum in the 5.925-7.125 gigahertz band (“6 GHz band”).²

The Alliance supports the Commission’s efforts in these proceedings to identify new opportunities for unlicensed use in the 6 GHz band. As stated in the NPRM, the 6 GHz band is an ideal location for unlicensed services due to its proximity to the 5 GHz bands, and the fact that the 6 GHz band shares virtually identical propagation properties to the 5 GHz bands.³

Automakers recognize that the demand for spectrum resources, especially for unlicensed use, has increased substantially in recent years to support innovations in technology requiring connectivity to wireless networks. This need will only continue to rise as we move to fifth generation (“5G”) wireless and the host of applications that it will enable. We appreciate the FCC’s commitment to a balanced spectrum strategy that pushes for more licensed and unlicensed spectrum into the commercial marketplace while protecting and preserving incumbent licensed operations in the spectrum band.

While the FCC has proposed tailored rules that will support compatibility of unlicensed operations in each portion of the 6 GHz band,⁴ it is essential that any new unlicensed operations in the band do

¹ The Auto Alliance is the leading advocacy group for the auto industry. Its members include BMW Group, FCA US LLC, Ford Motor Company, General Motors Company, Jaguar Land Rover, Mazda, Mercedes-Benz USA, Mitsubishi Motors, Porsche, Toyota, Volkswagen Group of America and Volvo Cars North America, and represent approximately 70 percent of all car and light truck sales in the United States. For further details, see <http://www.autoalliance.org/>.

² *Unlicensed Use of the 6GHz Band*, Notice of Proposed Rulemaking, FCC 18-147 (rel. Oct. 24, 2018).

³ *Id.* at 8.

⁴ *Id.* at 2.

not cause harmful interference to licensed intelligent transportation system (“ITS”) applications in the nearby 5.850-5.925 GHz band (“5.9 GHz band”). The Alliance remains committed to preserving the entire 5.9 GHz band for transportation safety applications. Connected vehicle and infrastructure technologies hold great promise to provide economic, environmental, and societal benefits, such as reduced crashes, decreased congestion and fuel consumption, and increased access for the elderly and disabled. These technologies support safer and more efficient transportation systems throughout our nation. But, these technologies could be severely undermined by harmful interference from unlicensed use in the 5.9 GHz spectrum or out-of-band emissions from adjacent bands. As commented by other industry members and organizations, we also ask the Commission to ensure that safeguards are in place to protect ITS applications in the 5.9 GHz band from potential out-of-band emissions from secondary 6 GHz unlicensed operations.

The United States Department of Transportation (“U.S. DOT”) has expressed that preserving the 5.9 GHz band for transportation communications is essential to public safety today and in the future.⁵ According to the U.S. DOT, more than 70 active deployments of vehicle-to-everything communications with thousands of vehicles are already on the road, and this technology has the potential to improve infrastructure, safety, and efficiency as the Department works to make road travel and future transportation significantly safer. Today, more than 30 states have active connected vehicle deployments with over 70,000 vehicles and over 65,000 other devices.⁶ These deployments have been enabled by investments by states and cities, infrastructure owners and operators, and vehicle manufacturers. All of those existing investments rely on the availability of the 5.9 GHz spectrum band to operate.

The Alliance supports the Commission’s efforts to provide more spectrum in the 6 GHz band for unlicensed uses, and strongly urges the FCC to ensure that any new unlicensed operations in the 6 GHz band do not cause harmful interference to licensed ITS operations in the 5.9 GHz band.

Respectfully submitted,



Anne Marie Lewis,
Senior Director, Technology and Innovation Policy

⁵ <https://www.nhtsa.gov/press-releases/us-department-transportations-national-highway-traffic-safety-administration-issues>

⁶ Belcher, S., Merlis, E., McNew, J., & Wright, M., Roadmap to Vehicle Connectivity. (September 2018). SFB Consulting. p. 25.