

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

In the Matter of)
)
Wireless Telecommunications Bureau)
Seeks Comments Regarding Intelligent) WT Docket No. 01-90
Transportation System Applications Using)
Dedicated Short Range Communications)

Comments of TransCore Corporation

1. TransCore Corporation (“TransCore”) respectfully submits its comments in response to the Commission’s Public Notice (DA 01-686) in the above-referenced docket seeking comment on the report entitled “Status Report on Licensing and Service Issues and Deployment Strategies for DSRC-based Intelligent Transportation Services in the 5.850-5.925 GHz Band” (“Status Report”) submitted by the Intelligent Transportation Society of America on October 6, 2000.

2. TransCore is a major ITS (Intelligent Transportation System) system manufacturer and integrator, based in the U.S. and implementing ITS systems throughout the U.S. and around the world. Many of TransCore’s systems are DSRC-based and we have been actively participating in development of DSRC standards for many years. Recently this has included the emerging standards for next-generation DSRC operating in the 5.850 to 5.925 GHz band allocated to ITS in October, 1999.

3. TransCore certainly supports the FCC allocation of the 5.850 – 5.925 GHz band for ITS services and believes that the primary allocation made in this band is essential for the provision of critical ITS services, most notably the full slate of Public Safety applications being considered by

the standardization groups. We state for the record that it is also essential to maintain the current 915 MHz DSRC band allocation to accommodate many existing ITS systems, primarily electronic toll collection systems, Commercial Vehicle weigh station bypass systems, electronic border crossing systems and early implementations of electronic commerce.

4. Since it is expected that many next-generation DSRC-based systems will be implemented along the national borders with Canada and Mexico, and in fact used in electronic border crossing systems on both sides of the borders, TransCore believes that it is important for the regulatory bodies of all three countries to work together in pursuit of compatible standards and rules.

5. TransCore believes that only Public Safety and Private Radio applications should be permitted in this band. Specifically, we believe that there is no role for Commercial Wireless (CMRS) providers within this 75 MHz allocation since the band will be fully loaded with Public Safety and Private Radio applications. With the implementation of ITS services expected to increase dramatically over the coming years, it is important that the capacity for system growth be maintained and that the band not be over-subscribed in its earliest days. We therefore request that the FCC not consider allowing CMRS applications in this band.

6. The most efficient ITS system architectures being considered for use of this band involve mixed Public Safety and Private Radio usage throughout the band. TransCore believes that this is the right approach and supports an open allocation for mixed usage of these two application types over the entire band. This delivers the best possibilities for support of the expected rapid expansion of ITS infrastructure in this band.

7. TransCore supports (and contributed to the development of) information supplied within the referenced Status Report. The document gives a true and fair appraisal of past and current activities and issues associated with creation of operating rules and standards for the band.

8. TransCore is concerned with the extreme range requirements of one proposed Public Safety application (Emergency Vehicle Signal Preemption) and believes that this application does not fall within the logical performance envelope for next-generation DSRC. We completely support Emergency Vehicle Signal Preemption as an important application, but know that there are other ways to provide this service without adversely affecting the band use plan and/or the systems providing other services within the band. Emergency Vehicle Signal Preemption requires a 1000 meter (3000+ feet) operating range for its RF systems, whereas all other ITS applications being considered for the next generation can be supported with a 1000 foot range requirement. We are concerned that either a dedicated portion of the band must be given over to this single application or an unacceptable performance and cost burden must be placed on all systems operating in the band.

9. TransCore is pleased to comment on the development of next-generation DSRC technology within the recently allocated band. These systems are essential in support of many valuable new

ITS services, making life better and safer for drivers throughout the nation.

Respectfully submitted,

TransCore

By: /s/ **Richard N. Schnacke**_____

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