

## Comments of the North Texas Tollway Authority

**FCC Proceeding:** “In the Matter of Amendment of the Commission’s Rules Regarding Dedicated Short-Range Communications in the 5.850-5.925 GHz Band (5.9 GHz Band), WT Docket No. 01-90”.

### **1. On The FCC rules and Communication Standards**

The North Texas Tollway Authority (NTTA) fully supports a standardized communication mode that is fully interoperable and free of proprietary equipment restrictions. All systems should conform to the standards set. NTTA’s customers have been demanding interoperability and the Authority has pressed that in the Team Texas organization, representing toll interests throughout the state. We feel that it is very desirable for the FCC to write rules for the ITS RS band, which will support a nationwide communications standard.

It is imperative, however that operating licenses in the 915 MHz band continue to be provided for electronic toll collection systems currently using that band. For the economic health of organizations already using electronic toll collection, a long-term migration path is absolutely necessary.

### **2. On “Whether to license Roadside Units by site or geographical area”**

It is important to the NTTA that licensed toll operations in the 900 MHz band be extended until it the Authority can migrate to the new band at its own pace. RSU geographical licenses might disrupt toll operations, as well as ITS information. The NTTA also supports RSU corridor licenses for the entire toll system of individual toll agencies.

### **3. On “Whether to permit non-public safety radio DSRC operations in the 5.9 GHz band”**

NTTA believes lower cost devices can be obtained through large volume production of the On Board Units, and this will result from sharing the ITS RS Band. It is very important, however, that any private use of the Band not interfere with toll collection operations.

### **4. On “the definition of public safety in the context of ITS”**

NTTA believes its toll projects should be included as public service organizations, providing a public transportation service. Reliable and timely safety information is provided drivers on NTTA projects already through the internet and variable message

signs. Any addition to the system of providing safety information would provide a further public safety service.

**5. On “the interoperability necessary for DSRC operations and how this interoperability would be achieved”**

Interoperability is absolutely necessary to achieve the development of a common ETC system, but it should be achieved through a long-term migration path. Many tolling organizations already have millions of devices in use by motorists involving a great investment in current electronic toll collection.

The International Bridge, Tunnel & Turnpike Association’s ‘OmniAir could be used to provide an independent determination of interoperability and standard compliance. This would be trusted by the toll industry and would prevent standards based on specific vendors and higher costs.

**6. On “whether to license On Board Units (OBUs) associated with fixed systems under the associated RSU license”**

The OBUs should be licensed based on the RSU license, a practice that has worked well for electronic toll collection in the 915 MHz band, enabling the RSU to execute timely and secure toll transactions. Data security is an extremely important issue, which can only be maintained through the controlled communication environment of an RSU licensed operation.

**7. On “whether the OBUs not associated with a fixed system should be licensed by rule or unlicensed under Part 15.”**

As long as controls on transmissions to prevent interference with RSU communications are provided, NTTA would support independent OBUs for safety purposes. This would mean Licensed By Rule OBU operations. The control of standards for all OBU emissions would prevent such interference. Unlicensed OBUs would not provide adequate protection.

**8. On “various channelization plans**

NTTA supports the ITS America band plan, which was coordinated with Canada and Mexico. Border crossings in Texas utilize toll fees for operations and maintenance. It is necessary to have a band plan that is compatible with Canada and Mexico.