

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
Amendment of the Commission's Rules Regarding Dedicated Short- Range Communications Services in the 5.850-5.925 GHz Band (5.9 GHz Band))	WT Docket No. 01-90
)	
Amendment of Parts 2 and 90 of the Commission's Rules to Allocate the 5.850-5.925 GHz Band to the Mobile Service for Dedicated Short Range Communications of Intelligent Transportation Services)	ET Docket No. 98-95
)	

**REPLY COMMENTS OF THE TECHNICAL AFFAIRS COMMITTEE
OF THE ASSOCIATION OF INTERNATIONAL AUTOMOBILE
MANUFACTURERS, INC.**

April 15, 2003

The Technical Affairs Committee of the Association of International Automobile Manufacturers, Inc. (AIAM)¹ provides the following comments related to the Commission's notice of proposed rulemaking regarding licensing and service rules for the 5.850-5.925 GHz Band (5.9 GHz Band) for Dedicated Short-Range Communications (DSRC) in the Intelligent Transportation Systems (ITS) Radio Service.

AIAM supports the Commission's allocation of the 5.9 GHz Band for DSRC systems operating in the ITS Radio Service and the recommendation of the Intelligent Transportation Society of America (ITSA) that public safety and private users share the band, with public safety activities having priority over private transmissions. Permitting both public safety and private use of the band will provide a larger market for DSRC applications than would exist if the band were restricted to public safety users only, thus

¹ *AIAM Technical Affairs Committee members are American Honda Motor Co., American Suzuki Motor Corp., Hyundai Motor America, Isuzu Motors America, Inc., Kia Motors America, Saab Cars USA, and Subaru of America. Associate members include Aston Martin Lagonda of North America, Inc., Denso International America, Inc., Ferrari North America, Inc., Peugeot Motors of America, Renault, SA, and Robert Bosch Corporation.*

creating a larger incentive for the development of DSRC technology that could be deployed in numerous DSRC applications.

AIAM agrees with the recommendation of ITSA that the word “non-voice” be deleted from the definition of DSRC. We are concerned, however, that the definition of “private services” in the subject Notice does not include vehicle-to-vehicle private applications. Expanding the definition of “private services” to include vehicle-to-vehicle communication is consistent with the reasoning for allowing private users to share the band with public safety users; that is, to create greater incentives for the development and deployment of DSRC technologies, which should lead to faster penetration of DSRC-based safety applications in the vehicle fleet. Vehicle-to-vehicle applications should not be excluded from these incentives.

AIAM supports adoption of the ASTM-DSRC standard to ensure interoperability of all DSRC devices and services in the 5.9 GHz band. Consistent with the comments filed by ITSA on March 17, 2003, AIAM believes in the need to ensure that DSRC devices and services are interoperable throughout the United States in order to fully provide the public benefits associated with allocating the 5.9 GHz Band for DSRC. AIAM supports adoption of the ASTM E2213-02 DSRC Standard to achieve this interoperability. Application of this standard to all users of the 5.9 GHz band will ensure interoperability among public safety users of the spectrum and contribute to a faster deployment of DSRC-based ITS services than might otherwise be possible in the absence of a single standard.

DSRC-based ITS services have the potential to benefit the public by providing access to public safety and non-public safety services and information through both vehicle-to-vehicle and vehicle-to-infrastructure communication. The combination of allowing public safety and private use of the band along with the requirement for interoperability will encourage development of DSRC technologies and speed the deployment of these applications.

AIAM appreciates the Commission’s consideration of our comments. Should you have any questions on this matter, please contact me at (703)525-7788 extension 233.

Respectfully Submitted,



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