FEDERAL COMMUNICATIONS COMMISSION

Office of Secretary
445 12th Street SW
Washington, DC 20554

In the Matter of Amendment of the Commission's Rules Regarding Dedicated Short-Range Communications in the 5.850-5.925 GHz Band (5.9GHz Band), WT Docket No. 01-90.

Reply comments submitted electronically by

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INTRODUCTION

The OmniAir Consortium, Inc., (OmniAir) is a non-profit membership organization that developed in tandem with the FCC allocation of the 5.9GHz frequency band and the drafting of ASTM E2213-02, the standard specification for telecommunications and information exchange between roadside and vehicle systems. The future suppliers and implementers of these systems created OmniAir to:

- Develop and provide interoperability compliance testing and third-party certification of the DSRC Standard for 5.9GHz "next generation" telematics systems;
- Promote the proliferation of the Standard and develop awareness and acceptance of the technology;
- Identify and develop business rules that permit national data transaction reciprocity and reconciliation, and;
- Encourage manufacturers, integrators, toll road operators and application service providers in the commercial, public and personal services sectors to support, supply, procure and deploy equipment and services adhering to the ASTM standard and the business rules.

The goal of OmniAir is the full deployment of "next generation" telematics: user driven, seamless, safety and private mobility services that enhance the driving experience and save people, time and resources.

OmniAir$_{sm}$ is the consumer brand mark for a secure, high data-rate, DSRC transaction using the 5.850–5.925 GHz frequency. The OmniAir Consortium was founded as a public interest organization made up of transportation professionals, equipment manufacturers, integrators, application service providers, users, and policy makers. The OmniAir brand mark, defined and supported by the Consortium, will provide this group and the general public a consumer-friendly means for identifying interoperable products and assuring that both telematics devices and delivered services work together. On behalf of member stakeholders, OmniAir will also manage the amendments and enhancements planned for future wireless systems using this frequency. The abiding theme of OmniAir is to address what we have learned from the past. The Consortium promotes the ideal of 5.9 DSRC as 'open and inevitable.'

As such, the OmniAir Consortium, Inc. respectfully submits the following responses to the NPRM. We support next generation intelligent transportation system radio services and strongly agree with and reinforce the specific comments of the International Bridge Tunnel & Turnpike Association as previously submitted to the docket on March 17th, 2003.

SUMMARY

The OmniAir Consortium, Inc. supports the creation of a dedicated ITS RS band for numerous reasons. The foremost motivation is a prospective rule requiring standardization and an interoperable communication mode that we feel is fundamental to enable a speedy national deployment of next generation telematics. In fact, in the final rules, OmniAir strongly and specifically recommends that the FCC stipulate and require users of RS licenses in the new allocated frequency to use the ASTM consensus standards. OmniAir also supports the larger bandwidth and specification with higher data rate capability because it enables the deployment of more telematics services. Lastly, we welcome the opportunity for protection of co-primary status against interference, as we believe this will safeguard and thus, encourage new investment in system infrastructure.

SPECIFIC COMMENTS ON FCC RULES & COMMUNICATION STANDARDS

5.9GHz telematics is an evolution, not a revolution. OmniAir believes that users – which include organizations that purchase and deploy ITS systems *and* the end-consumer that requests the service – will embrace telematics, but will do so smartly and going slowly at first. They will start with simpler communication services and migrate toward receiving and analyzing more complex data. Inspired by the good results from these first applications and a gradual buy-in from service providers, staff, peers, administrators, management, etc, telematics will grow. It is already growing, albeit more slowly than predicted.

The reason for this is 'standards,' or more specifically, the lack of them. For example, the most ubiquitous of DSRC services today is electronic toll collection (ETC). The systems in use today – as robust, reliable, and popular as they are – were created in the 1980's and were not intended for the 21st century transportation demands being addressed by this rulemaking. Even in this one application, where entities within regions have made great strides by forming cooperative aggreements that permit interoperability between individual toll service providers, there is now demand for interoperability between regions and nations. The proprietary patchwork of solutions the toll industry fielded as a response is complex, limiting and expensive. Add to this situation yet more applications and more service providers, and one can see the detrimental affect on the fledgling industry should the FCC *not* support a national communication standard.

Open standards and non-proprietary protocols in the manner of the ASTM model – along with OmniAir certification – are the lynchpins to the full and complete use of the band and the prompt national deployment of public and private telematics applications.

We at OmniAir appreciate the opportunity to comment on the rules pertaining to the designation of the 5.850-5.925 GHz frequency band for DSRC systems. The FCC's timely actions on this issue will provide the telematics industry with the opportunity to provide smarter, safer, and more enjoyable mobility to all motorists and promote the long-term national interoperability of next generation telematics systems.

Sincerely,

Tim McGuckin
Executive Director
OmniAir Consortium, Inc.