ITS AMERICA V2X PRINCIPLES

1. **Vehicular, infrastructure, and vulnerable road user communications will include existing publicly available telecommunications mediums** (such as cellular, satellite, and other wireless communications) **as well as high-speed/low-latency/dedicated mediums** (such as DSRC or C-V2X). Some applications will only be possible in licensed spectrum scenario due to safety-of-life concerns.

2. **V2X Communications (including vehicle-to-vehicle, vehicle-to-infrastructure, and vehicle-to-pedestrian and other vulnerable road users) will enable CV applications that can save lives.** Every year that goes by, more lives are lost unnecessarily. We need a heightened sense of urgency concerning deployment from both the public and private sector.

3. **V2X Communications will provide an enhanced safety layer for automated driving system applications** currently in development or in production for vehicles of all types (automobiles, trucks, and transit vehicles). Sensors alone are good, but cooperative (CAV) is better.

4. **Any licensed spectrum for V2X Communications should be free from harmful interference** on both sides of the band, in order to ensure high reliability connectivity in safety-of-life applications.

5. **We urge the FCC to consult with transportation safety experts to ensure their actions are evidence-based, consistent with real-world experience.** The FCC used flawed logic in its decision-making to significantly reduce the amount of licensed spectrum available for V2X Communications. The history of use in the 5.9 GHz band, economic analyses, interference calculations, and general understanding of how V2X will be utilized were all misrepresented in the recent draft Report & Order that was voted on by the FCC on Nov 18, 2020.

6. **The full 75 MHz of the 5.9 GHz band must be preserved for V2X Communications.** Our Future of V2X Working Group has analyzed application needs and 30 MHz is not sufficient - if the current FCC action proceeds, additional spectrum must be identified urgently.

7. **The US DOT should be considered an expert-on-record** for the FCC concerning this issue and their feedback should be taken into account for future decision-making in the 5.9 GHz band.

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