



**Statement of the National Safety Council
United States House of Representatives
Committee on Energy and Commerce
Communications and Technology Subcommittee
Hearing on
Accountability and Oversight of the Federal Communications Commission
Thursday, December 5, 2019**

Thank you for holding this important hearing on Accountability and Oversight of the Federal Communications Commission (FCC) and for allowing the National Safety Council (NSC) to submit a statement for the record.

NSC is a 100 year-old nonprofit organization with the mission of eliminating preventable deaths at work, in homes and communities, and on the road. NSC is pleased that, as part of today's hearing, the House Committee on Energy and Commerce will examine the FCC consideration of a proposal to reallocate spectrum that has been reserved for transportation safety to Wi-Fi services.

The National Safety Council strongly considers adopting the proposal to limit the amount of spectrum available for safety in the 5.9 GHz band, which has been reserved for transportation safety technology and advancements for well over a decade, to be a grave mistake. The federal government, as well as numerous automakers and suppliers, have proven this band is viable for vehicle communications, and some are beginning to deploy to this dedicated spectrum.

Improvements in technology and safety in transportation have historically gone hand-in-hand. Setting aside this spectrum for transportation safety was done with the goal of reducing or mitigating fatal transportation incidents, some of which were at least partially attributable to predictable and preventable human behavior. This FCC proposal nullifies this foresight and removes the full benefit that technology provides.

Roadway crashes and the resulting deaths are an epidemic in the U.S. How many more people need to die in crashes to help FCC commissioners understand that restricting the safety spectrum will cost lives? Having dedicated spectrum allows transportation industry players to test and deploy promising services without the threat of harmful interference from Wi-Fi users. Should interference happen – which is a risk if the spectrum is split – the consequences could be severe.

Using wireless connections can enable vehicles and other road users to communicate in real-time, along with the surrounding infrastructure to coordinate traffic and avoid collisions, thus saving lives and reducing congestion. V2X services provide tremendous potential to improve

transportation safety are growing in demand., Sharing or re-channelizing the 5.9 GHz band could nullify progress already made, unnecessarily delay implementation, devalue prior 5.9 GHz technology investment and, most critically, could lead to the unnecessary loss of lives. Therefore, it is essential that the entire 5.9 GHz band be retained for V2X, and that all measures are taken to ease the path for deployment.

Attached is a letter from 15 leading safety and consumer organizations sent to Chairman Pai on October 28, 2019, urging the FCC to maintain the entire 5.9 GHz band for transportation safety.

Today, we have millions of drivers behind the wheel, spend millions of dollars on education and enforcement campaigns and lose millions of hours stuck in traffic. The National Highway Traffic Safety Administration states that 36,750 people died in 2018 due to crashes – operating a motor vehicle remains one of the deadliest things we do on a daily basis in spite of much improved, safer vehicle designs and record-setting seat belt use rates across the nation. The FCC should be part of the solution to saving lives. NSC urges the Subcommittee to seek answers from the FCC commissioners about the safety impacts of this proposal, and ensure that roadway safety remains our top priority.

October 24, 2019

The Honorable Ajit Pai
Chairman
Federal Communications Commission
445 12th St. SW
Washington, D.C. 20554

Dear Chairman Pai,

The undersigned safety organizations urge the Federal Communications Commission (FCC) to help save lives on our roadways. According to the National Highway Traffic Safety Administration (NHTSA), in 2017, 37,133 people died in motor vehicle crashes.¹ That equates to over 100 people a day dying on American roads, and these deaths are preventable. One way to make large, sustained gains in reducing roadway deaths and injuries is through technology, and therefore, we urge you to preserve the 5.9 GHz band for transportation safety.

With the tremendous potential to improve transportation safety and the growth in demand for vehicle-to-everything (V2X) services, it is essential that the entire 5.9 GHz band – all seven channels – be retained for V2X, and that all measures are taken to smooth the path for deployment. Unless and until the FCC and the U.S. Department of Transportation complete the agreed-upon three phases of testing to inform DSRC/Wi-Fi sharing and prove that safety will not be compromised, these safety innovations must have dedicated spectrum to ensure they work properly every time, without signal interference. Harmful interference from unlicensed devices sharing the same band could affect the speed at which a V2X message is delivered or even prevent delivery entirely. As new technology continues to be deployed, now is the time for the FCC to commit to protecting the progress and investment made in V2X communications. Sharing or rechanneling the 5.9 GHz band could nullify progress already made, unnecessarily delay implementation, devalue prior 5.9 GHz technology investment, and most importantly could lead to the unnecessary loss of lives.

We have the potential to save thousands of lives if the dedicated spectrum is maintained for its original use. In order to accelerate the deployment of new life-saving technologies, we urge you and your colleagues to maintain the entire 5.9 GHz band for transportation safety.

Sincerely,

AAA
Advocates for Highway and Auto Safety
American Association of Motor Vehicle
Administrators
American Association of State Highway and
Transportation Officials
Center for Auto Safety
Consumer Reports
Governors Highway Safety Association

Insurance Institute for Highway Safety
International Association of Fire Chiefs
Institute of Transportation Engineers
MADD
National Association of State EMS Officials
National Safety Council
National Sheriffs' Association
Safe Kids Worldwide

¹ <https://www.nhtsa.gov/press-releases/us-dot-announces-2017-roadway-fatalities-down>