



March 9, 2020

Ms. Marlene Dortch
Secretary, Federal Communications Commission
445 12th Street SW
Washington, DC 20554

Re: Docket No. 19-138, FCC 19-129 “Use of the 5.850-5.925 GHz Band”

Dear Ms. Dortch:

The Association of Metropolitan Planning Organizations (AMPO) is pleased to offer the following comments in response to the Federal Communications Commission’s (FCC) “Use of the 5.850-5.929 GHz Band” (ET Docket No. 19-138, FCC Docket No. 19-129), issued on February 6, 2020. AMPO represents the needs and interests of Metropolitan Planning Organizations (MPOs) nationwide and serves as a liaison between MPOs and the federal government.

AMPO and its members recognize the tremendous benefits of vehicle connectivity and automation when included in the surface transportation system. Connected and automated vehicles have the potential to significantly improve safety, increase capacity, reduce congestion, reduce environmental impacts, and expand mobility options and accessibility for all if allowed the full utilization of the 5.9 GHz spectrum. However, the FCC proposal would significantly hinder the ability to leverage the potential benefits of connected and automated vehicle technologies. AMPO and the American Association of State Highway and Transportation Officials (AASHTO) work closely together as our collective members serve as the stewards of the nation’s surface transportation system. AMPO and AASHTO are in agreement that the FCC should continue to allocate the entire 5.850-5.925 GHz band for Intelligent Transportation Systems (ITS) purposes in order to further enable the deployment of connected and automated vehicles that will ultimately save lives and improve mobility. The use of the full 5.9 GHz spectrum is critical to support safe, flexible, and successful deployment and implementation of connected and automated vehicle technologies. This full spectrum is critical for also protecting vulnerable road users, enabling emergency vehicle preemption, providing transit vehicle priority, supporting edge computing, and supporting new standards for future handsets. AMPO supports the

Association of Metropolitan Planning Organizations
444 North Capitol Street, NW Suite 532
Washington, DC 20001
202-624-3680
www.ampo.org

comments and concerns provided by AASHTO in its comment letter to the FCC dated March 2, 2020 and submits the AASHTO comments as part of its letter.

In addition, AMPO supports the letters sent by Secretary Elaine Chao to Chairman Pai, and House Transportation and Infrastructure Committee Chairman DeFazio and Ranking Member Graves to the FCC Commissioners stating their opposition to the FCC's proposed reallocation of the 5.9 GHz spectrum as well as the Preliminary Technical Assessment prepared by the U.S. Department of Transportation (USDOT).

AMPO appreciates the opportunity to provide these comments. We look forward to working with USDOT and our stakeholder partners on the further development and deployment of the life-saving technologies that will be enabled by keeping the 5.9 GHz spectrum dedicated for transportation purposes. If you have any questions or would like to discuss AMPO's comments, please contact Bill Keyrouze, Interim Executive Director, at 202-624-3680 or bkeyrouze@ampo.org.

Sincerely,

A handwritten signature in black ink that reads "William T. Keyrouze". The signature is written in a cursive style with a large initial "W".

Bill Keyrouze
Interim Executive Director
Association of Metropolitan Planning Organizations