

Memo:

To: Mort Downey, Tony Kane
cc: ITS Management Council
ITS Strategic Planning Group
ITS Joint Program Office

From: Chris Johnson, ITS Joint Program Office

Subj: *ITS America's Petition to the FCC requesting allocation for DSRC*

Date: May 20, 1997

The Intelligent Transportation Society of America (ITSA) filed yesterday with the Federal Communications Commission (FCC) a petition to request that the frequency band between 5850-5925MHz be reallocated to allow *DSRC* (Dedicated Short Range Communications) services to operate in the band. DSRC is the communications link identified by the ITS National Architecture to support eleven existing, emerging, and future ITS user services.

The rulemaking process that will be started by this action is a crucial building block in the effort to develop a self-sustaining industry for ITS products *and* services, and our vigilance will be required. The policy attention of the SPG and the ITS Management Council will likely be required from time to time.

The action of filing the petition fulfills a year-old resolution by the ITSA Board of Directors to pursue this spectrum allocation as a critical step towards ensuring that the DSRC segment of the ITS industry has adequate spectrum to evolve. A press release should be issued tomorrow by ITSA. The FCC has indicated that it will issue a special Public Notice during the week of ITSA's Annual Meeting (June 2 - 6) inviting comment from the public on the petition; the period for comments will likely be 60 days from the date of issue.

A lengthy (probably multi-year) sequence of public debate is now likely to take place in the forum of the FCC rulemaking process. The desired end result will ideally be an FCC Order that allows some degree of DSRC operation in the band, and the subsequent development of a healthy DSRC industry to support expansion of ITS services.

Two things will be required for the process to result in a successful outcome: (1) support for the concept -- with a convincing economic or public benefit argument -- from industry, with a relative lack of vehement opposition from other contenders for that spectrum; and (2) a

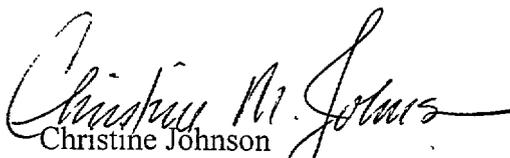
convincing *technical* case to be demonstrated that indicates that these DSRC applications can co-exist effectively with other existing users in the band. (These users currently include certain types of military test-range radars, earth-to-space satellite communication facilities, amateur radio users, and certain other low-power industrial devices; one other party -- a maker of advanced hearing aid equipment -- is also interested in using this frequency band.)

The first issue, obtaining a balance of support from industry, has been addressed by ITSA through an involved coordination process among its membership and with other users of the band. It is in the second area, the demonstration of technical compatibility between DSRC and other applications, that DOT has an important and continuing role to play. FHWA has heretofore sponsored the technical analysis that supported ITSA's decision to file this petition, and it will now be called upon to provide further support, as well as answer technical challenges to its assertions in the public docket managed by the FCC. No other single entity will likely be able to match the technical resources of the other contenders to the band to the degree seen in other, similar rulemaking processes.

This is especially true in the area of demonstrating the ability of DSRC to co-exist with current military radar applications in certain areas. FHWA has obtained a *Certificate of Spectrum Support* from the Department of Commerce that will allow DSRC applications to be developed in this band, on a strictly experimental basis, while ITSA's permanent allocation request is running its course. However, use of these experimental applications is contingent on FHWA being able to demonstrate that no harmful interference exists between applications and military applications -- and FHWA is taking steps to do just this.

The 60-page petition contains much more information on the subject, including an executive summary. Please contact my office if you would like a copy of the petition. In addition, we will attempt to both distribute the main body of the petition electronically as an attachment to an electronic mail note, and post the full petition (with attachments) on line at the ITS web site sometime later this week (at <http://www.its.dot.gov>, under 'What's New').

If you have any questions, please contact my office. Thank you.


Christine Johnson
Director, ITS Joint Program Office

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