March 2, 2020

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

Dear Chairman Pai,

We are the co-chairs of the Energy Security Leadership Council (ESLC), a coalition of retired four-star military and business leaders concerned with the United States’ dependence on oil and its impact on American economic and national security. The ESLC is a project of Securing America’s Future Energy (SAFE), an organization dedicated to enhancing U.S. energy security through maximizing domestic oil supply, reducing oil use in the transportation sector, and providing greater fuel choice to consumers.

We write to express our serious concern with the proposal contained within the FCC’s Notice of Proposed Rulemaking (NPRM) under ET Docket No. 19-138, which would reallocate 45 MHz of the 5.9 GHz band (the “Safety Spectrum”) away from transportation and reassign it for unlicensed uses such as Wi-Fi. Such a shift in regulation and approach threatens to derail the safety and efficiency benefits that the full Safety Spectrum can deliver, thereby disrupting American economic and national security goals.

Vehicle-to-everything (V2X) technologies hold tremendous promise to meaningfully reduce oil use in the U.S. transportation system through enabling vehicle functions such as braking assistance, crash avoidance, and congestion mitigation. Connectivity is also an important foundational technology for autonomy, and will pave the way for further savings resulting from autonomous vehicle (AV) deployment. As automobile manufacturers continue to integrate new technologies, we see the potential to unlock even greater energy security and safety benefits through the combination of connectivity, advanced driver-assistance systems, and AV technology.

A SAFE analysis shows that, if these available safety technologies are widely deployed alongside other traditional efficiency technologies, the combination of these technologies holds the potential for system-wide fuel savings of 18 to 25 percent and save 9,000 lives per year. This is especially critical in the context of U.S. dependence on oil, a volatile commodity prone to spikes in price and traded on an unfree market that is dominated by countries that share neither our strategic interests nor our free-market values. The United States is the world’s largest consumer of oil, accounting for one-fifth of daily global supply, more than 70 percent of which is used to power a transportation system that is 92 percent dependent on petroleum fuels.

In addition, the tremendous promise such technology holds for our society must not be overlooked. In 2018, 36,560 people died on U.S. roadways, with recent increases in pedestrian and cyclist deaths reported. These fatalities have resulted in annual direct economic costs of approximately $240 billion, rising to around $800 billion when quality-of-life valuations are taken into consideration.
Limiting the transportation safety applications in the 5.9 GHz band to less than 30 MHz of spectrum would degrade the performance of V2X technologies, as their functionality relies on instantaneous and uninterrupted communication. The FCC’s proposal would therefore prevent the realization of potential traffic safety and efficiency gains. The deployment of driver-assist technologies is already contributing to improvements in traffic fatality statistics, with the National Highway Traffic Safety Administration (NHTSA) recently citing the advanced technologies in newer vehicles that prevent or reduce the severity of crashes as a key reason for a 2.4 percent decline in road traffic deaths in 2018.

Furthermore, the FCC’s proposed reduction of the Safety Spectrum would indefinitely postpone the deployment of truck platooning technology, which uses V2X to allow two or more heavy-duty trucks to follow each other closely. Platooning has the potential to significantly increase the efficiency of long-haul trucks, which currently account for less than 4 percent of vehicles on the road but contribute to roughly 13 percent of U.S. petroleum consumption. Research conducted by the National Renewable Energy Laboratory found that this technology can achieve a 5-10 percent in fuel savings for platooning trucks.

Finally, we are in a race with competitors, including China, to develop, own and deploy the next generation of connected, autonomous, shared, and electric vehicles. Many of our competitors are continuing to protect this spectrum for the automotive industry and transportation uses. Our vehicles must be compatible with markets around the world and the incentive must exist for all companies to choose the U.S. for development and deployment of this technology.

Meaningful improvements in traffic safety, societal well-being, and energy security will be increasingly realized through greater deployment of V2X technologies – especially as they contribute to the introduction of autonomous vehicles. Accordingly, we urge you to preserve the full 5.9 GHz spectrum for transportation applications. It is vitally important that the FCC does not institute any changes to the longstanding federal spectrum policies that enable V2X technology.

For more information or with any questions, please contact Robbie Diamond, President and CEO of SAFE, at rdiamond@secureenergy.org, or 202-746-4611.

Sincerely,

Frederick W. Smith
Chairman and CEO, FedEx Corporation
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General James T. Conway (Ret,)
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