

From: Kevin Fiant

To: Hung Le

Date: December 18, 2020

Subject: Request for Info - File # 0952-EX-CN-2020

Message:

We are in receipt of your 11/30/2020 correspondence regarding our experimental license request for the use of DSRC technology within the US-33 Smart Mobility Corridor (US-33 SMC). The US-33 SMC project is a result of USDOT ATCMTD Grant funding and requires a significant State and Local funding match. Prior to amending experimental license request to operate in the 5895 – 5925 MHz range, we would ask that the FCC reconsider our request to utilize the 5855 – 5905 MHz range, in accordance with our systems engineering requirements documentation for this project. Any modifications to the current systems engineering requirements documentation would cause substantial delay and financial hardship to the State and Local communities attempting to deploy this technology along the US-33 SMC.

We have outlined below our proposed program deployment and operation plan for the US-33 SMC and we believe it falls within the current FCC rulemaking, related to the 5.9 GHz band. This outline has been shared by Ohio DOT Director with FCC Chief of Policy and Licensing Division, Mr. Michael Wilhelm, via email correspondence on October 9 & 11, 2020, October 13, 2020, and November 4, 2020. This correspondence has led us to file for experimental licensure for this project. We feel that experimental licensure is the best option as it defines that this project has been authorized for a special use case and allows us to continue with planned testing and deployment to meet our project goals. We will attach, via separate email to FCC Contact, Hung Le, the above referenced correspondences.

Our proposed program deployment within the context of FCC Experimental Licensure is outlined as follows:

1. Submit and receive approval from the FCC for a Conventional Experimental Radio License (CERL) for a period of 1 year for activities along the US-33 Smart Mobility Corridor related to the following V2X applications:

- • Queue Warning
- • Wrong Way Driver Warning
- • Spot Weather Warning
- • Reduced Speed / Lane Closure Warning
- • Curve Speed Warning
- • Red Light Violation Warning
- • Pedestrian Crossing Warning

This would allow the development and testing of the above applications and related V2X messaging in a manner that could then be transitioned and utilized by new forms of radio technology as they become available in commercially available, certified equipment. During this 1 year period, we will also develop plans to transition to utilize the upper channels of the spectrum, specifically channels 180, 182, and 184.

2. Prior to the expiration of the year 1 Conventional Experimental Radio License (CERL) stated above, we propose to submit an additional application to transition the above year 1 CERL for a new year 2 Conventional Experimental Radio License for use of equipment on the upper channels as stated above. This license would be for a term of 1 year and be purposed for the continued development and evaluation of V2X applications to be supported by V2X roadside and onboard equipment. During this period, we would also begin to transition our existing roadside devices towards approved, certified technology, available at that time.

3. As the year 2 CERL approaches expiration, we would take action to turn off any remaining DSRC

devices and begin the transition to the technology set forth, by the FCC, for V2X Transportation Safety at that time.