

April 27, 2020

Federal Communications Commission
445 12th Street, SW
Washington, D.C. 20544

Re: Notice of Proposed Rulemaking, Use of 5.850-5.925 GHz Band, ET Docket No. 19-138

The National Business Aviation Association (NBAA), representing over 12,000 member companies that rely on aircraft to support their company missions, offers the following perspectives to the Federal Communications Commission (FCC) on the Notice of Proposed Rulemaking (NPRM) on the Use of the 5.850-5.925 GHz Band. NBAA urges the Commission to consider the utilization of this unique band for connected vehicles, both on the surface and in the air, while collaborating with other transportation agencies to ensure emerging technology functionality is considered.

We acknowledge existing rules for the 5.9 GHz Band permit transmissions from aircraft. Of specific importance is the need for dedicated spectrum for vehicle-to-vehicle (V2V) and vehicle-to-infrastructure (V2I) transmissions in the air and on the ground. As the Commission considers the use of the 5.9 GHz Band, it remains important aircraft have dedicated spectrum for V2V and V2I use for aircraft. If this cannot be achieved through 5.9 GHz, an alternative band should be identified for V2V and V2I functionality.

In looking at the future state of multi-modal transportation, to include emerging technologies such as Unmanned Aircraft Systems, Urban and Advanced Air Mobility, it is important to evaluate and support the need for how connected vehicles on both the ground and in the air will communicate. Based on this need, we urge the Commission, in collaboration with the Department of Transportation and the Federal Aviation Administration, to ensure the continued use of the 5.9 GHz band for transportation related communications for V2V and V2I functions for vehicles on the ground and in the air.

NBAA appreciates the opportunity to share inputs on this proceeding and looks forward to the Commission's decision to ensure allocated spectrum remains available for both V2V and V2I communications. Please let us know if any additional information would assist with your efforts

Sincerely,



Heidi J Williams
Director, Air Traffic Services & Infrastructure