

January 2, 2024

Sean Conway  
Deputy Chief Counsel  
National Telecommunications and Information Administration  
U.S. Department of Commerce  
1401 Constitution Avenue, NW  
Washington, D.C. 20230

**RE:** [Notice of Opportunity for Public Input on Implementation of the National Spectrum Strategy](#)

Dear Deputy Chief Counsel Conway:

The Alliance for Automotive Innovation (“Auto Innovators”) appreciates the opportunity to provide input to the National Telecommunications and Information Administration (“NTIA”) on the development of an implementation plan for the National Spectrum Strategy (“Strategy”). We recognize that the Strategy provides the Administration with an important opportunity to rethink spectrum policy and assist industry in promoting innovation. For this reason, we look forward to the upcoming implementation plan that will provide details about responsible parties and timelines to achieve the specific objectives within the Strategy.

Auto Innovators represents the manufacturers that produce most of the cars and light trucks sold in the U.S., original equipment suppliers, battery makers, technology companies, and other value chain partners within the automotive ecosystem. Representing approximately 5 percent of the country’s GDP, responsible for supporting 10 million jobs, and driving \$1 trillion in annual economic growth, the automotive industry is the nation’s largest manufacturing sector.

As we shared in our [April comments](#) on the development of the Strategy, the automotive industry is on the verge of an unprecedented transformation in personal mobility. Many of the technologies that facilitate this transformation are enabled or enhanced through access to spectrum. As a result, the auto industry’s spectrum needs are expanding rapidly. Since the spectrum supply is currently lagging behind the pace of innovative automotive use cases, we appreciate the Strategy’s recognition that the transportation sector, including the automotive industry, is a key stakeholder in spectrum policy going forward. To that end, we strongly support the Strategy’s Strategic Objective 1.2 and look forward to working with the NTIA to ensure that spectrum resources are available to support automotive innovation now and into the future.

At the same time, we are supportive of the Strategy’s focus on the formalization of best practices to guide spectrum analysis, allocation decisions, and transition processes. As these best practices are developed, we urge NTIA to ensure that they adequately account for and respect the diversity of spectrum policy stakeholders. In other words, best practices adopted by NTIA should

not unfairly advantage traditional stakeholders over emerging stakeholders, such as the automotive industry.

Our April comments also stressed the importance of interagency collaboration. We noted that automotive companies are subject to regulation by multiple agencies, making communication and collaboration with these regulators vital to the success of new and existing automotive technologies. We urged the NTIA to collaborate not only with the Federal Communications Commission (“FCC”), but also the Department of Transportation (“DOT”) and the Environmental Protection Agency (“EPA”) to ensure that the subject matter expertise of these agencies is reflected in any spectrum allocation decisions that impact their areas of regulatory jurisdiction or interest. We appreciate that the Strategy lays out a plan to develop an architecture for a new collaborative framework that will give stakeholders the opportunity to share their perspectives on future spectrum policies, include an ongoing process for solicitation of new and future spectrum requirements, and solicit the views of stakeholder federal agencies in a timely fashion. We support this collaborative and inclusive approach.

We understand the Strategy’s articulated need to “regularly update the Nation’s spectrum strategy” to “ensure the on-going health of U.S. spectrum policy.” However, as we noted in our April comments, it typically takes several years to bring new technology to market in a production vehicle and up to ten years to phase in the technology across the entire vehicle portfolio. We also noted that vehicles are on the road far longer than a mobile device is in use. As a result, we recommended that the Administration provide a “reasonably foreseeable spectrum environment” to support development and investment in automotive technologies. We strongly urge the NTIA to balance the need for flexibility with the need for predictability in its implementation plan.

We also highlighted in our prior comments the need for automotive safety and security technologies to be reliable and insulated from the threat of harmful interference. To that end, we appreciate that the Strategy emphasizes the importance of “data-driven, risk-informed spectrum sharing compatibility and coexistence analysis.” However, we are concerned about the identification of the 7125-8400 MHz band of spectrum as one to be studied for wireless broadband use. This band is currently used by automakers to support keyless entry systems, or key fobs, that utilize ultra-wideband (“UWB”) technology. Any decision to repurpose this band away from UWB would be very problematic for keyless entry systems already in the U.S. market and for vehicles already under development that will rely on this band for this purpose. Moreover, any proposal to share this spectrum band with other use cases must guarantee adequate protection from harmful interference to these keyless entry systems. Harmful interference could not only negatively impact the ability of consumers to unlock or start their vehicles, but also potentially make vehicles less secure from theft.

Finally, we observed in our April comments that auto companies are building products for the global market. For this reason, international harmonization of spectrum bands and policies will help fuel innovation and create economies of scale. Although the Strategy makes a few references to international allocations and harmonization, we suggest that the implementation plan be a bit more intentional on this critical point.

Auto Innovators appreciates the opportunity to provide the automotive industry's perspective on the Strategy's implementation plan. We look forward to continued engagement with the NTIA on this important topic.

Sincerely,

A handwritten signature in black ink, appearing to be 'H. Cain', with a long horizontal line extending to the right.

Hilary M. Cain  
Senior Vice President, Policy