



The Vehicle Suppliers Association

---

Comments of  
MEMA, The Vehicle Suppliers Association  
to the  
Federal Communications Commission  
on the  
Unlicensed Use of the 6 GHz Band; and Expanding Flexible Use in Mid-  
Band Spectrum Between 3.7 and 24 GHz.  
Notice of Proposed Rulemaking  
March 27, 2024  
Docket 18-295

---

### Introduction

MEMA, The Vehicle Suppliers Association, is the leading trade association in North America for vehicle suppliers, parts manufacturers, and remanufacturers. It has been the voice of the vehicle supplier industry since 1904.

Automotive and commercial vehicle suppliers are the largest employer of manufacturing jobs in the United States employing over 900,000 people throughout the country. Direct, indirect, and induced vehicle supplier employment accounts for over 4.8 million U.S. jobs and contributes 2.5 percent to U.S. GDP.

Suppliers lead the way in new vehicle innovations. Member companies conceive, design, and manufacture the OE systems and technologies that make up two-thirds of the value of every new vehicle and supply the automotive aftermarket with the parts that keep millions of vehicles on the road, fueling international commerce and meeting society's transportation needs. MEMA members are committed to safety and sustainability.

### Discussion/Comments

In the Notice of Proposed Rulemaking (NPRM) the FCC seeks to expand use of unlicensed devices in the portion of spectrum reserved for licensed devices communicating for the purpose of enabling Intelligent Transportation Systems (ITS). The primary purpose of these systems is to improve safety for vehicles, vehicle occupants and vulnerable road users (VRU) in the vicinity of vehicles and transportation corridors. MEMA has previously opposed<sup>1</sup> proposals to allow or increase unlicensed use of the 6GHz spectrum for reasons of safety and concern for interference

---

<sup>1</sup> [https://www.fcc.gov/ecfs/search/search-filings/results?q=\(MEMA+AND+proceedings.name:\(%2219-138%22\)\)](https://www.fcc.gov/ecfs/search/search-filings/results?q=(MEMA+AND+proceedings.name:(%2219-138%22)))

with licensed equipment. We continue to urge the Commission to preserve and protect the spectrum currently allocated to ITS.

Suppliers provide V2X capable equipment and systems and must develop and meet requirements for safe, licensed use of the 6GHz band. It is a contradiction to open this band up further to unlicensed use and risk potential interference with or dilution of the safety V2X is expected to provide.

As noted<sup>2</sup> by the 5G Automotive Alliance (5GAA), a more forward-looking approach to the coexistence of V2X devices is needed. The further expansion of unlicensed very low power (VLP) devices at higher transmitting power contradicts this position and jeopardizes the future safety of vehicle occupants and VRU.

As noted by 5GAA<sup>3</sup> through real-world testing, degradation of in-vehicle C-V2X has been confirmed in settings involving VLP devices. The 5GAA tests conclude that coexistence of C-V2X and VLP is not practical and that interference can occur and degradation and packet errors of essential safety data were detected. As recommended by 5GAA, undesired emissions should be below -100.4 dBm/MHz to mitigate interference and risk to safety systems. We echo 5GAA's recommendation that "unlicensed mobile hotspot and VLP devices should avoid the lowest U-NII-5 channel, i.e., channel center frequency  $f_c < 5925 \text{ MHz} + \text{BW} * 3/2 \text{ MHz}$ ."

We support the position, communicated by 5GAA and the Department of Commerce's National Telecommunication and Information Administration (NTIA), that the FCC should prioritize unlicensed operations in channel above 6.000 GHz<sup>4</sup>.

In cases of disagreement between technical arguments for VLP operation (licensed vs. unlicensed devices), FCC is obliged to situate itself on the side of caution and protection. This is not different from Federal Aviation Administration practices and policies whereby airplane passengers are obliged to put mobile phone in "airplane mode" during flights. Such a practice would be impractical for typical driving, the safe policy therefore is to limit transmission power of VLP and decline to allow increased power of transmission, in counter to the NPRM.

## **Conclusion**

MEMA urges the FCC to conclude this current rulemaking by withdrawing its proposal to allow greater transmitting power in VLP devices which would increase the potential for interference with vehicle safety systems communications. The FCC should also look for other out-of-band VLP opportunities. This will help ensure robust, highly reliable safety services that will realize the full C-V2X opportunity in the Upper 5.9 GHz band.

Please do not hesitate to contact Alex Boesenberg, MEMA vice president of regulatory affairs, at [aboesenberg@mema.org](mailto:aboesenberg@mema.org) with any questions concerning this submission.

---

<sup>2</sup> <https://www.fcc.gov/ecfs/document/108020370819566/1>

<sup>3</sup> <https://www.fcc.gov/ecfs/document/120972110204/1> See attachment 1

<sup>4</sup> <https://www.fcc.gov/ecfs/document/10100544815627/1>