

**Before the  
Department of Transportation  
Washington, DC 20590**

Federal Motor Vehicle Safety Standards;    )  
V2V Communications                            )     Docket No. NHTSA–2016–0126  
  )

**COMMENTS OF APCO INTERNATIONAL**

The Association of Public-Safety Communications Officials-International, Inc. (APCO) hereby submits the following comments in response to the National Highway Traffic Safety Administration’s Notice of Proposed Rulemaking in the above captioned proceeding.<sup>1</sup>

Founded in 1935, APCO is the nation’s oldest and largest organization of public safety communications professionals. APCO is a non-profit association with over 27,000 members, primarily consisting of state and local government employees who manage and operate public safety communications systems – including 9-1-1 Public Safety Answering Points (PSAPs), emergency operations centers, radio networks, and information technology – for law enforcement, fire, emergency medical, and other public safety agencies.

The Administration proposes to establish a new Federal Motor Vehicle Safety Standard that would require new “light” vehicles to implement Vehicle-to-Vehicle (V2V) communications and would standardize the message and format of V2V communications.<sup>2</sup> Through use of on-board Dedicated Short Range Communications (DSRC), vehicles would be able to transmit and receive Basic Safety Messages (BSM) regarding “a vehicle’s speed, heading, brake status, and

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<sup>1</sup> Federal Motor Vehicle Safety Standards; V2V Communications, 82 Fed. Reg. 8 (proposed Jan 12, 2017) (to be codified at 49 CFR pt. 571). (“NPRM”).

<sup>2</sup> *Id.* at 3854.

other vehicle information” to and from surrounding vehicles.<sup>3</sup> V2V communications would also “employ omnidirectional radio signals that provide 360 degree coverage.”<sup>4</sup> According to the Administration, this technology will promote motor vehicle safety and potentially reduce the number and severity of motor vehicle crashes.<sup>5</sup>

While APCO does not weigh in on any particular proposed rules, APCO appreciates the Administration’s interest in leveraging new, advanced technologies to improve public safety. APCO generally supports the development of any innovative solutions that promote public safety, and aid PSAPs and first responders. Specifically, DSRC could offer dynamic capabilities to responders on scene and in communication PSAPs.<sup>6</sup>

For example, the vehicle information delivered via BSMs could assist PSAPs with providing resources to those in need more quickly and critical pre-arrival information to responders. Advanced vehicle communications systems could also make it possible to improve scene safety by notifying oncoming traffic of accidents and creating safe zones around public safety personnel and accident victims.

Additionally, the Administration’s proposals for use of V2V communications in consumer vehicles could potentially serve as a blueprint for implementation of V2V communications in first responder vehicles. Initial deployments of V2V communications technologies could also offer lessons learned for the public safety community.

APCO looks forward to the Administration’s continued progress with DSRC and the lifesaving potential of V2V communications..

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<sup>3</sup> *Id.* at 3855.

<sup>4</sup> *Id.*

<sup>5</sup> *Id.*

<sup>6</sup> APCO filed comments in the 5.9 GHz proceeding at the Federal Communications Commission, referenced in the Administration’s NPRM, in which APCO offered examples of important public safety use cases that can be made possible through DSRC, and stressed the need to ensure adequate interference protection for such operations. *See* Comments of APCO, ET Docket No. 13-49 (filed Jul. 7, 2016).

Respectfully submitted,

APCO INTERNATIONAL

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