

February 22, 2019

Docket Management Facility, M-30  
U.S. Department of Transportation  
West Building  
Ground Floor, Rm. W12-140  
1200 New Jersey Avenue SE.,  
Washington, DC 20590

RE: Notice of Request for Comments: V2X Communications  
[Docket No. DOT-OST-2018-0210]

To Whom It May Concern:

The Virginia Department of Transportation (VDOT) appreciates the opportunity to comment on the U.S Department of Transportation's (USDOT's) Notice of Request for Comments on V2X Communications, which includes vehicle-to-vehicle (V2V), vehicle-to-infrastructure (V2I), and vehicle-to-pedestrian (V2P) communications. As infrastructure owners and operators (IOO) of the nation's surface transportation infrastructure, state and local transportation agencies are at the core of the connected vehicle infrastructure. While automakers and device manufacturers (OEM) will dictate availability of vehicular equipment, transportation agencies will control the deployment and operation of roadside infrastructure and the incorporation of connected vehicle technologies into infrastructure applications; only through a strong partnership between USDOT, IOOs, and OEMs will the maximum potential benefits to safety and mobility be realized. While the focus of this letter is on V2X communications, we see and anticipate realizing the safety, mobility, and other benefits associated with V2X applications as part of a robust Connected Vehicle Environment throughout our Commonwealth.

In 2008, VDOT led a core group of seven states with a vision for the future to work together to create the Connected Vehicle Pooled Fund Study (CV PFS). This group of state, local, and international transportation agencies, partnered with Federal Highway Administration (FHWA) in order to provide a means to conduct the work necessary for infrastructure providers to play a leading role in advancing Connected Vehicle systems. As of January 2019, the CV PFS has 26 transportation agencies involved as paid members as shown in the map to the right. While VDOT serves as the lead agency in this pooled fund study, the comments in this letter only represent the opinions of our agency and should not necessarily be construed as endorsements by other members.



*Bringing Innovation to Transportation*

We believe that it is important to comment that collectively, the CV PFS has developed a wealth of experience and credibility through its robust research program. Its research program alone has funded more than \$8 million deployment focused research projects. A complete list of research projects CV PFS is available at [http://www.cts.virginia.edu/cvpfs\\_research](http://www.cts.virginia.edu/cvpfs_research). CV PFS members understand that a connected vehicles environment holds the potential to support a fundamental advance in surface transportation. While the vehicle component and infrastructure component of the transportation system have traditionally been only loosely coupled, connected vehicle technology will allow the components to “work” actively together – creating a fully connected vehicles and infrastructure environment. This provides the potential for reduction in congestion, safety improvements, and improved traveler services. In order to realize this potential, a connected vehicles system and environment will require unprecedented collaboration between the private and public sectors on a scale not required in the current loosely coupled system. CV PFS Members understand that DSRC is here now, and could begin saving lives almost immediately. This group also has seen firsthand how the uncertainty caused by a lack of endorsement of DSRC by the USDOT has caused unnecessary delays in this deployment.

VDOT believes that V2X communications will act as a catalyst that enables us to connect vehicles with our infrastructure to support our goals to improve safety and mobility on our roadways. Additionally, V2X communications will allow VDOT to explore new ways to reduce infrastructure costs; for example, VDOT is interested in understanding the how vehicles with V2V communications are able to obtain information they need to operate safely and efficiently directly into the vehicle instead of passively through signs and markings as we know them today.

VDOT has invested significant staff time and financial contributions in connected vehicle research and deployments and it is imperative that VDOT’s investments remain relevant. VDOT strongly believes in the importance of this national initiative to ensure interoperability between systems, vehicles, and users. National standards for V2I, V2V, and V2X communications are essential and VDOT believes individual states should not establish separate systems or regulations.

Thank you for allowing VDOT the opportunity to provide comments on the importance of advancing V2X Communications. If you have any questions regarding these comments, please contact Virginia Lingham PE, Connected and Automated Vehicle Program Manager, at (804) 692-0455.

Sincerely,



Catherine C. McGhee, P.E.  
Director of Research and Innovation

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