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Re: Docket No. FMCSA-2018-0037, "Safe Integration of Automated Driving Systems-Equipped Commercial Motor Vehicles"

The American Society of Civil Engineers (ASCE) submits the following comments to the Federal Motor Carrier Safety Administration's (FMCSA) "Safe Integration of Automated Driving Systems-Equipped Commercial Motor Vehicles" Advance Notice of Proposed Rulemaking (Docket Number FMCSA-2018-0037), issued on May 28, 2019.

ASCE supports the planning and development of connected and autonomous vehicle (CAV) technology as part of a safer, more integrated surface transportation network. The Society encourages U.S. Department of Transportation (USDOT) and its agencies to support the deployment of this technology to reduce traffic-related fatalities and serious injuries, while also supporting stronger planning, design, operation, and maintenance of surface roadways.

Founded in 1852, ASCE is the oldest national civil engineering organization and represents more than 150,000 civil engineers in private practice, government, industry, and academia. ASCE members are dedicated professionals who hold paramount public health, safety, and welfare as they design, build, construct, operate, and maintain the built environment. It is through this commitment that our members recognize the positive impacts evolving technologies can play in the movement of goods and people. Therefore, the Society advocates for policies that encourage the safe introduction of CAV technology within our infrastructure system, including commercial motor vehicles.

To achieve this vision and support a robust CAV freight and passenger network, we must preserve the 5.9 GHz band of spectrum as part of automation principles that will prioritize safety. Preserving the 5.9 GHz band of spectrum for Dedicated Short-Range Communications (DSRC) is critical in order to provide a dedicated platform for high-speed, secure, reliable and interoperable communication between vehicles and road users.

ASCE's *2017 Infrastructure Report Card*, which gave the nation's infrastructure a grade of "D+," states that infrastructure challenges remain significant, but solvable. We can address our infrastructure deficit through strategic and sustained investment, bold leadership, thoughtful planning, and careful preparation for the needs of the future. Leaders from all levels of government, business, labor, and nonprofit organizations must come together to ensure all investments are spent wisely, prioritizing projects with critical benefits to the economy, public safety, and quality of life. Using CAV technology in our equipped motor vehicles must be considered as a viable tool to enhance existing transportation infrastructure, foster connected communities, enhance mobility, and save lives.