Please allow me to comment on point 3 of the recommendations in the Public consultation on the Draft RSPG Opinion on Spectrum Aspects of Intelligent Transport Systems.

C2C-CC is convinced that in total at least 50 MHz of spectrum for traffic safety ITS and in addition 20 MHz of spectrum for non-safety ITS for the envisioned applications of the C2C-CC roadmap are necessary. The applications of the C2C-CC roadmap are all based on V2X (ITS-G5;802.11p) and were explained to RSPG in June 2016. Traffic safety applications of the C2C-CC roadmap include for example intersection assistance (collision avoidance), cooperative adaptive cruise control C-ACC, platooning, Vulnerable Road User VRU protection (like pedestrians, motorcycles), cooperative driving (like merging) up to fully automated driving.

I would suggest to modify the text to clearly include the distinction between the purpose of the communication in the potential extension bands as well as make it clear what is the channel band width.

There is no evidence that spectrum availability is currently a constraint on the development of ITS, and there is no immediate need to take regulatory action in this regard. But we recommend that the options for ITS ~~(in particular non-safety related ITS)~~ to expand to share spectrum for traffic safety ITS in the 20 MHz (2x~~20~~10 MHz) above ~~and below~~ the existing designation and for non-safety ITS in the 20 MHz (2x10 MHz) below the existing designation should be kept available for the time being. We recognise the risk that this could constrain other potential future uses of this spectrum, and recommend that this risk is kept under review.

Regards

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