

FORMAT FOR PARTICIPATING IN THE PUBLIC CONSULTATION

Instructions for filling and participation:

- I. Opinions, comments, proposals, contributions or other elements of analysis should be sent to the following email address: planeacion.espectro@ift.org.mx, where it should be considered that the limit capacity for receiving files is 25 MB.
- II. Provide your full name (name and surname), reason or company name, or the full name (name and surname) of the person who functions as **legal** representative. For the latter case, you must choose among the options the type of document with which you accredit said representation, as well as attach -to the same email address- legible electronic copy of it.
- III. Read carefully the **PRIVACY NOTICE regarding** the care and protection of your personal data, as well as the publicity that will be given to the comments, opinions and contributions presented **by you in this** consultative process.
- IV. Submit your comments in accordance with the structure of Section II of this format.
- V. If you have general comments or any additional input, please provide them in the last box.
- VI. In case it is of interest to you, you can attach to your email the documentation you deem appropriate.
- VII. The public consultation period will be from 20 August to 17 September 2021 (i.e. 20 business days). Once this period has ended, you can continue to view the comments made, as well as the attached documents at the following electronic address: <http://www.ift.org.mx/industria/consultas-publicas>
- VIII. For any doubt, comment or concern about this consultative process, the Institute puts at your disposal the following point of contact: Juan Pablo Rocha López, Director of Spectrum Attributions, email: juan.rocha@ift.org.mx or through the telephone number 55 5015 4000, extension 2726.

I. Data of the person participante	
Name, reason or company name:	CAR 2 CAR Communication Consortium
Where applicable, the name of the person acting as legal representative:	
Document for the accreditation of the representation: In case of having a person who functions as legal representative, attach a digitized copy of the document that accredits said representation, to the email indicated in numeral I of the instructions for the filling and participation.	Choose an item.
COMPREHENSIVE PRIVACY NOTICE OF PERSONAL DATA THAT THE FEDERAL TELECOMMUNICATIONS INSTITUTE COLLECTS THROUGH THE RADIO SPECTRUM UNIT	
<p>In compliance with the provisions of articles 3, section II, 16, 17, 18, 21, 25, 26, 27 and 28 of the General Law on Protection of Personal Data Held by Obligated Subjects (hereinafter, the "LGPDPPSO"); 9, section II, 15 and 26 to 45 of the General Guidelines for the Protection of Personal Data for the Public Sector (hereinafter the "General Guidelines"); 11 of the Guidelines that establish the parameters, modalities and procedures for the portability of personal data (hereinafter the "Portability Guidelines"), numeral Second, point 5, and numeral Fourth of the Personal Data Protection Policy of the Federal Institute of Telecommunications, the following Comprehensive Privacy Notice is made available to the holders of personal data:</p> <p>I. Name of the controller Federal Institute of Telecommunications (hereinafter referred to as the "IFT").</p> <p>II. Domicile of the person in charge Avenida Insurgentes Sur #1143, Colonia Nochebuena, Benito Juárez Territorial Demarcation, Postal Code 03720, Mexico City.</p> <p>III. Personal data that will be processed and its purpose The personal data that the IFT collects, through the Radio Spectrum Unit, are the following:</p> <ul style="list-style-type: none"> • <i>Identification data: Full name and Email.</i> • <i>Patrimonial and identification data: Documents that prove the personality as the name of the representative of a natural or legal person and that by their nature contain personal data, including but not limited to: Nationality, Civil Status, Domicile, Heritage, Signatures, Rubrics.</i> • <i>Ideological data: Comment, Opinion and/or Contribution.</i> <p>It is noted that in terms of article 3, section X of the LGPDPPSO, none of the above corresponds to sensitive personal data.</p> <p>IV. Legal basis that empowers the person in charge to carry out the treatment The IFT, through the Radio Spectrum Unit, carries out the processing of the personal data mentioned in the previous section, in accordance with articles 15, fractions XL and XLI, 51 of the Federal Law on Telecommunications and Broadcasting, last modification published in the Official Gazette of the Federation on October 31, 2017, 12, section XXII, second and third paragraphs and 138 of the Federal Law on Economic Competition, last modification published in the Official Gazette of the Federation on January 27, 2017, as well as the Eighth Guideline of the Guidelines for Public Consultation and Regulatory Impact Analysis of the Federal Institute of Telecommunications, published in the Official Gazette of the Federation on November 8, 2017, collected in the exercise of their functions.</p> <p>V. Purposes of the processing</p>	

The personal data collected by the IFT will be protected, incorporated and specifically safeguarded in the files of the Radio Spectrum Unit, and will be treated in accordance with the following specific, lawful, explicit and legitimate purposes:

- A. Disseminate in full the documentation regarding the comments, opinions and / or contributions derived from the participation of individuals in the public consultation processes in charge of the IFT.
- B. Send to the IFT, through the electronic address enabled for this purpose, your participation in the public consultation processes.
- C. Accredit the personality in case the comments, opinions and / or contributions, or other elements of the consultative processes are presented by the interested parties through a legal representative.

VI. Information regarding transfers of personal data requiring consent

The Radio Spectrum Unit **will not carry out the processing of personal data for** purposes other than those expressly indicated in this privacy notice, nor will it transfer personal data to other managers, of a public or private nature, except those that are strictly necessary to meet information requirements of a competent authority, which are duly founded and motivated, or when any of the cases provided for in articles 22 and 70 of the LGPDPSO are updated. Such transfers will not require the consent of the holder to take place.

VII. Mechanisms and means available for the owner, where appropriate, to express their refusal to process their personal data for purposes and transfers of personal data that require the consent of the owner

In accordance with the provisions of section VI, of this privacy notice, it is reported that the personal data collected will not be subject to transfers that require the consent of the owner. However, in the event that the owner has any questions regarding the processing of their personal data, as well as the mechanisms to exercise their rights, they can go to the Transparency Unit of the IFT, located at Avenida Insurgentes Sur #1143 (Headquarters Building), Piso 8, Colonia Nochebuena, Benito Juárez Territorial Demarcation, Postal Code 03720, Mexico City, or send an email to the following [address unidad.transparencia@ift.org.mx](mailto:unidad.transparencia@ift.org.mx), and even communicate to the telephone 55 5015 4000, extension 4688.

VIII. The mechanisms, means and procedures available to exercise ARCO rights (rights of access, rectification, cancellation and opposition to the processing of personal data)

Requests for the exercise of ARCO rights must be submitted to the Transparency Unit of the IFT, through free writing, formats, electronic means or any other means established by the National Institute of Transparency, Access to Information and Protection of Personal Data (hereinafter the "INAI").

The procedure shall be governed by the provisions of articles 48 to 56 of the LGPDPSO, as well as paragraphs 73 to 107 of the General Guidelines, in accordance with the following:

- a) The requirements that the application must contain for the exercise of ARCO rights.

- Name of the owner and his address or any other means to receive notifications;
- The documents that prove the identity of the holder and, where appropriate, the personality and identity of his representative;
- If possible, the area responsible for processing the personal data and to which the request is submitted;
- The clear and precise description of the personal data with respect to which it is sought to exercise any of the ARCO rights;
- The description of the ARCO right that is intended to be exercised, or what the owner requests, and
- Any other element or document that facilitates the location of personal data, if any.

- b) The means through which the owner may submit applications for the exercise of ARCO rights.

The means are established in the eighth paragraph of article 52 of the LGPDPSO, which states the following: Requests for the exercise of ARCO rights must be submitted to the Transparency Unit of the person in charge, which the owner considers competent, through free writing, formats, electronic means or any other means established for this purpose by the INAI.

- c) The forms, systems and other simplified means that, where appropriate, the INAI has established to facilitate the holder's exercise of their ARCO rights.

The forms that the INAI has developed for the exercise of ARCO rights are available on its Internet portal www.inai.org.mx, in the section "Protection of Personal Data" / "How to exercise the right to the protection of personal data? / "In the public sector" / "Procedure for exercising ARCO rights".

- d) The means authorized to respond to requests for the exercise of ARCO rights.

In accordance with the provisions of article 90 of the General Guidelines, the response adopted by the person in charge may be notified to the holder in his Transparency Unit or in the offices he has authorized for this purpose, after accreditation of his identity and, where appropriate, of the identity and personality of his representative in person, or by the National Transparency Platform or registered mail in which case the notification through a representative for these last two means will not proceed.

- e) The modality or means of reproduction of personal data.

According to the provisions of article 92 of the General Guidelines, the modality or means of reproduction of personal data will be through direct consultation, on the site where they are located, or through the issuance of simple copies, certified copies, magnetic, optical, sound, visual or holographic media, or any other technology determined by the owner.

- f) The deadlines established within the procedure – which must not contravene the provisions of articles 51, 52, 53 and 54 of the LGPDPSO – are the following:

The person in charge must establish simple procedures that allow the exercise of ARCO rights, whose response period must not exceed twenty days from the day following receipt of the request.

The period referred to in the previous paragraph may be extended for a single time up to ten days when justified by the circumstances, and provided that the holder is notified within the response period.

If the exercise of arco rights is appropriate, the person responsible must make it effective within a period that may not exceed fifteen days from the next day on which the response has been notified to the owner.

In the event that the request for data protection does not satisfy any of the requirements referred to in the fourth paragraph of article 52 of the LGPDPSO, and the person responsible does not have elements to correct it, the owner of the data will be prevented within five days of the submission of the request to exercise arco rights, for a single occasion, to remedy the omissions within a period of ten days from the day following that of the notification. Once the period has elapsed without venting the prevention, the request for the exercise of ARCO rights will be desoouted.

The prevention will have the effect of interrupting the period that the INAI has to resolve the request for the exercise of ARCO rights.

When the person in charge is not competent to attend to the request for the exercise of ARCO rights, he must inform the owner of this situation within three days of the presentation of the request, and if he can determine it, direct him to the competent responsible.

When the provisions applicable to certain processing of personal data establish a specific procedure or procedure to request the exercise of ARCO rights, the person in charge must inform the owner about the existence of the same, within a period not exceeding five days following the submission of the application for the exercise of ARCO rights, in order for the latter to decide whether to exercise its rights through the specific procedure, or through the

Public Consultation on the Integration of the "Questionnaire on spectrum needs for intelligent in-band transport systems of frequencies 5850-5925 MHz"

procedure that the person in charge has institutionalized for the attention of requests for the exercise of ARCO rights in accordance with the provisions established in articles 48 to 56 of the LGPDPPSO.

In the specific case, it is reported that there is no specific procedure to request the exercise of ARCO rights in relation to the personal data that are collected on the occasion of the fulfillment of the purposes reported in this privacy notice.

g) The right of the holder to file an appeal for review with the INAI in case of being dissatisfied with the response.

The aforementioned right is established in articles 103 to 116 of the LGPDPPSO, which provide that the holder, by himself or through his representative, may file an appeal for review with the INAI or the Transparency Unit of the person responsible who has known of the request for the exercise of ARCO rights, within a period which may not exceed fifteen days from the date following the date of notification of the reply.

In case the holder has any doubts regarding the procedure for the exercise of ARCO rights, he can go to the Transparency Unit of the IFT, located at Avenida Insurgentes Sur #1143 (Headquarters Building), Piso 8, Colonia Nochebuena, Benito Juárez Territorial Demarcation, Postal Code 03720, Mexico City, send an email to the following address.unidad.transparencia@ift.org.mx OR call 55 5015 4000, extension 4688.

IX. Mechanisms, means and procedures to exercise the right of portability of personal data before the IFT.

Regarding the right to the portability of personal data, it is reported that none of the categories and / or personal data collected is technically portable, as it does not update the assumptions referred to in article 8 of the Portability Guidelines.¹

X. The address of the IFT Transparency Unit.

The Transparency Unit of the IFT is located in Avenida Insurgentes Sur #1143 (Headquarters Building), Floor 8, Colonia Nochebuena, Benito Juárez Territorial Demarcation, Postal Code 03720, Mexico City, and has a customer service module on the ground floor of the building, with a working hours from 9:00 a.m. to 6:30 p.m., monday through Thursday, and Friday from 9:00 a.m. to 3:00 p.m., telephone number 55 5015 4000, extension 4688.

XI. The means through which the person in charge will communicate to the owners the changes to the privacy notice.

Any changes to the Privacy Notice will be communicated to the holders of personal data on the microsite called "Privacy Notices of the portals belonging to the Federal Institute of Telecommunications", available at the electronic address: <http://www.ift.org.mx/avisos-de-privacidad>

Last updated: (27/01/2020)

¹ Available in the electronic link: http://dof.gob.mx/nota_detalle.php?codigo=5512847&fecha=12/02/2018

II. Questionnaire of the Public Consultation on Integration

Note 1: The document "Identification of spectrum needs for intelligent transport systems in the band 5850-5925 MHz", is a reference document that helps in understanding the questions listed in the following table. By itself, that reference document is not properly under public consultation.

Note 2: It is recommended to answer all the questions contained in the following table, accompanied by the arguments, approaches, justifications and elements of analysis that are considered necessary to support the opinion, including supporting documents that you wish to attach.

No. of question	Question	Comments, opinions or contributions
1	<p>What do you think is the most appropriate use for the 5850-5925 MHz frequency band in Mexico? State the reasons that justify your response.</p>	<p>Car2Car CC recommends to use the globally harmonized 5850-5925 MHz range (5.9 GHz range) for short range direct ITS communications to increase traffic safety to significantly reduce the number and severity of traffic accidents. In addition, it will enable cooperative automated driving in the future.</p> <p>Our proposal is in line with the Recommendation of the World Radioconference 208 (WRC-19) and the Recommendation of the ITU Radiocommunication Sector (ITU-R) ITU-R M.2121 which recommend "the use of 5850-5925 MHz, or parts thereof, for current and future ITS applications". It's a unique chance to facilitate the deployment of ITS by economy of scale.</p> <p>As outlined in the reference document provided by IFT, several other countries (e.g. recently Brazil) have already allowed ITS in the 5.9 GHz band for Vehicle-to-Vehicle (V2V), Vehicle-to-Infrastructure (V2I) and Vehicle-to-Pedestrian (V2P) communication. In our view the 5.9 GHz range should be reserved for ITS uses cases which have a local context in the vicinity of a vehicle independently of cellular network coverage and where low-latency is essential. Vehicle-to-Network (V2N) enables additional ITS applications especially over larger distances. We recommend to deploy V2N (cellular mobile communication) in other frequency bands (with IMT identification) and we are not aware that this is allowed anywhere in the world in the 5.9 GHz band.</p> <p>Taking into account the spectrum needs especially for advanced applications of ITS, we would kindly propose to allow ITS in the whole 5.9 GHz frequency range between 5850MHz to 5925MHz to allow for ITS evolution for automated driving.</p> <p>Finally Car2Car CC would like to point towards the regulatory regime in place in Europe, which, by allocating 70 MHz of spectrum on a licence-exempt basis to C-ITS, has allowed for commercial deployments to start in 2019.</p> <p>Sources: ECC Dec. (08)01 https://docdb.cept.org/document/412</p> <p>ECC Rec. (08)01 https://docdb.cept.org/document/984</p> <p>EU Implementing Decision (EU) 2020/1426 https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32020D1426</p> <p>EU Implementing Decision (EU) 2019/1345 https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32020D1426</p>

No. of question	Question	Comments, opinions or contributions
2	Does it mean that the current use of the 5850-5925 MHz frequency band should remain unchanged? State the reasons that justify your response.	To the current band allocation of 5850-5925 MHz ITS should be added as a radio application under the primary Mobile Service, with that ITS will be protected against other applications in the mobile Service. New fixed links licenses should not be granted in the new ITS band as they would interfere into ITS if near a road.
3	Do you consider it feasible to enable the operation of Sistemas of Transporte Inteligente in the frequency band 5850-5925 MHz, OR in part thereof? If yes, what do you consider to be the amount of radio spectrum necessary for the implementation of the T Sistemas of Transporte Inteligente in Mexico? State the reasons that justify your response.	Following the Recommendation 208 (WRC-19) 75 MHz of spectrum are sufficient in 5.9 GHz band. Other bands can complement with short range direct ITS communication which can be objective of future public consultations in the area of below 1 GHz or 60 GHz bands for future automated driving. C2C-CC has conducted a detailed study that 70-75 MHz are the necessary amount of ITS spectrum in 5.9 GHz for traffic safety, see https://www.car-2-car.org/documents/general-documents/ the C2C-CC "Position Paper on Road Safety and Road Efficiency Spectrum Needs in the 5.9 GHz for C-ITS and Cooperative Automated Driving" with detailed calculations for typical safety use cases in Europe (figure 7) and US (figure 8) and all calculations in the Annex (page 23ff). We believe that the 5.9 GHz band is ideal to be used for ITS, which consists of V2V, V2I and V2P communication, to improve traffic safety and traffic efficiency. For examples please also see answer to question 6.

No. of question	Question	Comments, opinions or contributions
4	<p>What do you think can be the arrangement of frequencies or channeling in the frequency band 5850-5925 MHz for the operation of the Sistemas of Transporte Inteligente in Mexico? State the reasons that justify your response.</p>	<p>The channelization should be based on 10 MHz wide channels to reach a maximum of global harmonization in the 5855-5925 MHz which also enables economy of scale. 10 MHz channeling like Europe, Brazil and US as of today, see Report ITU-R M.2444-0 (11/2018) "Examples of arrangements for Intelligent Transport Systems deployments under the mobile service"</p>

No. of question	Question	Comments, opinions or contributions
5	<p>Do you consider it feasible to enable the operation of Sistemas de Transporte Inteligente in the frequency band 5850-5925 MHz, OR in part thereof, under the free spectrum mode? Or do you consider it feasible to enable the operation of Sistemas de Transporte Inteligente in the frequency band 5850-5925 MHz, OR in parts of it, under the concession modality? Indicate the advantages and disadvantages, as well as the reasons that justify your response.</p>	<p>The frequency range 5850-5925 MHz should only be used by direct V2V, V2I or V2P communication. It should be operated under license exempt rules and thus not requiring a license for spectrum access for an ITS devices. Otherwise the deployment of ITS might be significantly delayed because specific license regimes have to be developed.</p>

No. of question	Question	Comments, opinions or contributions
6	<p>What use cases of Intelligent Transport Systems can be enabled in the frequency band 5850-5925 MHz? State the reasons that justify your response.</p>	<p>All use cases listed in Report ITU-R M.2445-0 (11/2018) "Intelligent transport systems (ITS) usage" chapter 7.6. But most important are the safety use cases listed in 7.6.1 and 7.6.2.</p> <ul style="list-style-type: none"> - Basic safety use cases, also called day one use cases allow awareness driving with "here I am message" (in Europe CAM/ in US BSM), warning messages DENM and to react upon traffic light phases SPaTM, and detailed road, lane, map information with MAPM. <p>Beyond basic safety applications that require more the full 75 MHz ITS spectrum in 5.9 GHz:</p> <ul style="list-style-type: none"> - Vulnerable road user safety warning applications (CPM, VAM) - Collective perception / Sensor sharing applications using Collective Perception Message (CPM), also called Coordinated Perception - Connected Lane Merge/cooperative driving with maneuver coordination message (MCM) - Full suite of platooning use-cases (PCM platooning control message) - Cooperative adaptive cruise control (C-ACC) <p>In addition most of the considered message extensions towards cooperative automated vehicles (CAV) are facilitated.</p> <p>Sources:</p> <ul style="list-style-type: none"> • C2C-CC Roadmap in About C-ITS (car-2-car.org) https://www.car-2-car.org/about-c-its/; • Objectives & Organisational Structure (car-2-car.org) https://www.car-2-car.org/fileadmin/downloads/PDFs/roadmap/Roadmap_2020_figure.pdf; • Explanations of advanced ITS use cases all achievable with DSRC in C2C-CC White paper "Guidance for day 2 and beyond roadmap": https://www.car-2-car.org/fileadmin/documents/General_Documents/C2CCC_WP_2072_RoadmapDay2AndBeyond_V1.2.pdf

No. of question	Question	Comments, opinions or contributions
7	<p>What technical conditions of operation and coexistence would be necessary for the operation of Sistemas de Transporte Inteligente without causing harmful interference to the existing systems in the frequency band 5850-5925 MHz in Mexico? Example: height, elevation angles, maximum PIRE, Density Espectral Potencia (DEP) of maximum PIRE, DEP, maximum power conducted, antenna gain, out-of-band emission limits, maximum channel widths, etc. Indicate the reasons that justify your response and provide the corresponding technical substantiation of any related aspect.</p>	<p>Spectrum Regulation should be technology neutral and should facilitate the coexistence with Fixed Satellite Service (FSS) operating in this band in a earth-to-space mode.. EN 302 571 fulfill those requirements as coexistence to FSS was studied in the relevant European ECC and CEPT reports</p> <p>Without an in-depth analysis of the existing, we assume the situation in Mexico is comparable to the one in analyzed in CEPT Report 20 and ECC Report 101.</p> <p>Source:</p> <ul style="list-style-type: none"> • "Compatibility studies in the band 5855- 5925 MHz between Intelligent Transport Systems (ITS) and other systems" ECC report 101, 2007, https://docdb.cept.org/download/441. • "Report from CEPT to EC in response to the Mandate on the harmonised radio spectrum use for safety critical applications of Intelligent Transport Systems (ITS) in the European Union", 2007, https://docdb.cept.org/download/21. • "Intelligent Transport Systems (ITS); Radiocommunications equipment operating in the 5 855 MHz to 5 925 MHz frequency band; Harmonised Standard covering the essential requirements of article 3.2 of Directive 2014/53/EU", 2017 latest published and EU Commission harmonized version, https://www.etsi.org/deliver/etsi_en/302500_302599/302571/02.01.01_60/en_302571v020101p.pdf.

No. of question	Question	Comments, opinions or contributions
8	<p>What are the technical conditions that you consider necessary to apply for the protection of existing systems in adjacent frequency bands, i.e. below frequency 5850 MHz and/or above frequency 5925 MHz, in case of the implementation of Sistemas de Transporte Inteligente operating in the frequency band 5850-5925 MHz in Mexico? Example: power limits, operating mask, guard bands, etc. Indicate the technical reasons that justify your response.</p>	<p>No other additional requirements needed, see sources in answer to question 7.</p>

No. of question	Question	Comments, opinions or contributions
9	<p>What other considerations do you consider to be applicable for the operation of Sistemas de Transporte Inteligente in the frequency band 5850-5925 MHz in Mexico? Example: duplex transmission method, correction of errors in reception, modulation scheme, control of access to the medium, etc. Indicate the reasons that justify your response.</p>	<p>Following the idea of global harmonization that facilitates wide deployment and economy of scale for ITS in the 5.9 GHz range, we would recommend not to implement technical parameters referring to one single ITS technology. Globally wide support have direct LTE-V2X/5G-V2X (both not being coexistent with each other and not interoperable with each other) and/or DSRC using IEEE802.11p or IEEE802.11bd (both being coexistent with each other and interoperable with each other and supporting all ITS use cases in the C2C-CC roadmap up to automated driving). We recommend to keep the ITS band technology neutral.</p>

No. of question	Question	Comments, opinions or contributions
10	<p>What other question could you comment on the possible implementation of Sistemas de Transporte Inteligente in the frequency band 5850-5925 MHz in Mexico? State the reasons that justify your response.</p>	<p>In order to protect ITS from harmful interference, proper out-of-band emission limits may be required by applications above or below the 5850-5925 MHz. For instance in ECC Dec. (20)01 for CEPT and in (EU) 2021/1067 for the European Union, an out-of-band emission limit of -45 dBm/MHz is defined for very low power WAS/RLAN devices operating in 5945-6425 MHz. (The limit may increase to -37 dBm/MHz from 1 January 2025.)</p> <p>ECC Decision (20)01 https://docdb.cept.org/download/1448</p> <p>Comission Implementing Decision (EU) 2021/1067 https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32021D1067&from=EN</p> <p>Please also have a look at the answer to question 1.</p>

No. of question	Question	Comments, opinions or contributions
11	<p>Do you consider it feasible to enable any portion of the 5850-5925 MHz frequency band for applications other than intelligent transport systems under the free spectrum mode? If yes, what do you consider to be the amount of radio spectrum necessary for the implementation of applications other than intelligent transport systems in Mexico? Indicate the advantages and disadvantages, as well as the reasons that justify your response.</p>	<p>Car2Car CC proposes that the 5.9 GHz band should be dedicated to short range direct ITS communication in order to increase traffic safety and efficiency.</p> <p>Since ITS can be operated everywhere on- and off-road, Car2Car CC's recommendation is to not have additional applications allowed in the band – especially unlicensed ones – to protect ITS applications from harmful interference. Apart from this, the existing 75 MHz can fairly accommodate the full set of safety related functions of V2X. Therefore, other applications will easily congest existing channels and disturb fundamentally any V2X-deployment plan.</p>

No. of question	Question	Comments, opinions or contributions
12	<p>What do you think can be the provision of frequencies or channeling in the frequency band 5850-5925 MHz for the operation of applications other than intelligent transport systems under the free spectrum modality in Mexico? State the reasons that justify your response.</p>	<p>please refer to our answer provided to question No. 11.</p>
13	<p>What use cases for applications other than intelligent transport systems that can be enabled in the frequency band 5850-5925 MHz under the free spectrum modality in Mexico? State the reasons that justify your response.</p>	<p>please refer to our answer provided to question No. 11.</p>

14	<p>What technical, operating and coexistence conditions would be necessary for the operation of applications other than intelligent transport systems under the free spectrum mode without causing harmful interference to existing systems in the frequency band 5850-5925MHz in Mexico? Example: height, elevation angles, maximum PIRE, maximum PIREspectral Eensity (DEP), maximum PIRE power, maximum power conducted, antenna gain, out-of-band emission limits, maximum channel widths, etc. Indicate the reasons that justify your response and provide the corresponding technical rationale. Indicate the reasons that justify your answer and provide the corresponding</p>	./.
----	--	-----

No. of question	Question	Comments, opinions or contributions
	technical justification of any related aspect.	
15	<p>What are the technical conditions that you consider necessary to apply for the protection of existing systems in adjacent frequency bands, i.e. below frequency 5850 MHz and/or above frequency 5925 MHz, in case of the implementation of applications other than support and intelligent systems operating in the frequency band 5 850-5925 MHz under the free spectrum modality in Mexico? Example: power limits, operating mask, guard bands, etc. Indicate the technical reasons that justify your response.</p>	./.

No. of question	Question	Comments, opinions or contributions
16	<p>What other considerations do you consider to be applicable for the operation of applications other than the current and intermediate systems in the frequency band 5850-5925 MHz under the free spectrum modality in Mexico? Example: duplex transmission method, correction of errors in reception, modulation scheme, control of access to the medium, etc. Indicate the reasons that justify your response.</p>	./.

No. of question	Question	Comments, opinions or contributions
17	<p>What other question could you comment on the possible implementation of applications other than intelligent transport systems in the frequency band 5850-5925 MHz under the free spectrum modality in Mexico? State the reasons that justify your response.</p>	<p>./.</p>
18	<p>What would be the technical conditions of operation and coexistence necessary in the band 5850-5875 MHz for the operation of Intelligent Transport Systems with industrial, electrical and medical applications (ICM) in Mexico?</p>	<p>In CEPT 5855-5875 MHz is dedicated only to "non-safety" ITS applications by ECC Recommendation (08)01 consequently to the studies in CEPT Report 70. This is a result from the possible degradation of the reliability of ITS in the presence of "Short Range Devices" in the same frequency ranges. Following our spectrum needs calculations we see this band important for non-safety and safety ITS applications in this part of the band.</p> <p>ECC Recommendation (08)01 "ITS" https://docdb.cept.org/download/1835</p> <p>ERC Recommendation (70-03) "Short Range Devices" https://docdb.cept.org/download/25c41779-cd6e/Rec7003e.pdf</p> <p>For the frequency range 5875-5925 MHz, protection by an out-of-band emission limit for the applications below and above is necessary, please refer to the answer to question 10.</p> <p>ITS system operating in the band 5850 MHz to 5875 MHz should be able to coexist with ISM systems operated in the same band, including a fair spectrum access mechanism as provided by IEEE802.11p or IEEE802.11bd with duty cycle of below 1% in one hour and Listen Before Talk channel access mechanisms.</p> <p>Therefore we recommend to allocate the lower part of the band 5850-5875 MHz to ITS (including safety and non-safety ITS) and the upper part of the band 5875-5925 MHz to only safety ITS applications with highest possible protection of out-of-band emissions.</p>

No. of question	Question	Comments, opinions or contributions
19	What would be the amount of radio spectrum required for the implementation of ICM applications in the 5850-5925 MHz band, in the free spectrum mode?	Car2Car CC recommends not to extend the ISM applications to above 5875 MHz. Consequently at least in 5875-5925 MHz, ITS can be protected from harmful interference from any ISM device that could be operated near or even in a vehicle, for instances.
20	What practical technical tests do you consider necessary to perform in order to verify the compatibility and coexistence of ITS systems with applications or services operating in the band 5850-5925 MHz?	A set of requirements and tests should be developed to demonstrate the fair spectrum access between the different systems in the band 5850MHz to 5875MHz. Here mechanisms like listen-before-talk and limited duty cycle operation can support the fair sharing approach. With available technical requirements like given in EN 302 571 v2.1.1 automotive partners are able to demonstrate conformance through a self-certification regime.
21	Are there any other general aspects of the 5850-5925 MHz frequency band that you consider relevant to share with the Institute?	Please confer to the answer of question 1.

III. Comments, opinions, general contributions or other elements of analysis formulated by the participant

Note 3: Comments, opinions, contributions or other elements of analysis of a free nature related to the use of the frequency band 5850-5925 MHz may be made in this section. In case of making contributions related to the reference document "Identification of spectrum needs for intelligent transport systems in the band 5850-5925 MHz", place the corresponding section in the first column; otherwise, place the legend "N/A" (Not Applicable).

Note 4: The interested party should add the rows that he considers necessary to formulate the comments, opinions, contributions or other elements of analysis that he considers pertinent.

Study page number/reference document	Comment(s), opinion(s), contribution(s) or other elements of analysis