ALLIANCE FOR AUTOMOTIVE INNOVATION

Via E-Mail

January 26, 2024

The Honorable Jessica Rosenworcel
Chairwoman
Federal Communications Commission
45 L Street NE
Washington, DC 20554

Re: January 11, 2024, Letters to Automakers

Dear Chairwoman Rosenworcel,

Thank you for your outreach to our automaker member companies regarding the potential for the misuse of connected vehicle services in the domestic abuse context. The Alliance for Automotive Innovation ("Auto Innovators") has reviewed your January 11, 2024, letters to automakers and appreciates the opportunity to provide input on the auto industry's efforts to address these concerns.[1] Auto Innovators represents the full auto industry, including manufacturers, equipment suppliers, technology companies, and other value-chain partners within the automotive ecosystem. In that capacity, Auto Innovators strives for cleaner, safer and smarter personal transportation that helps transform the U.S. economy and sustain American ingenuity and freedom of movement. Given its role as a voice for the industry and a partner for policymakers, Auto Innovators writes to provide additional insight regarding the industry's efforts to prevent misuse of connected vehicle services and support survivors of domestic abuse. While the industry welcomes the opportunity to work with the Commission and other stakeholders to address these issues, the Safe Connections Act ("SCA") does not currently apply.

Safety is a cornerstone of the automotive industry and serves as a driving factor in automotive innovation and design. Consistent with that ethos, Auto Innovators understands the importance of protecting survivors of domestic violence from their abusers and is troubled by the potential and unacceptable abuse of connected vehicle services to stalk or harass domestic violence survivors. However, automakers do not have "shared mobile service contracts" associated with separate lines in a single vehicle. *See* SCA § 4(b)(1) (requiring covered providers to separate lines of shared mobile service contracts at the request a domestic abuse survivor); *accord* 47 C.F.R.

[1] *See* Press Release, *FCC Chairwoman Calls on Carmakers and Wireless Companies to Help Ensure the Independence and Safety of Domestic Violence Survivors* (Jan. 11, 2024), https://docs.fcc.gov/public/attachments/DOC-399700A1.pdf (providing hyperlinks to letters dated January 11, 2024 from Chairwoman Rosenworcel to the presidents/CEOs of Ford Motor Company; General Motors Company; American Honda Motor Co., Inc.; Hyundai Motor America, Inc.; Mercedes-Benz USA, LLC; Nissan North America, Inc.; Stellantis North America, LLC; Tesla, Inc.; Toyota Motor North America, Inc.; AT&T Services, Inc.; T-Mobile; and Verizon).

§§ 64.6400-6407 (implementing same). Each vehicle is associated with a telematics control unit (TCU) which is not capable of making and receiving calls in the same manner as a telephone, but instead functions to place one-way calls to call centers operated by or on behalf of the automaker. Automakers do not maintain call records, nor do they provide customer-facing call logs. *See* SCA § 5(b)(3) (requiring the Commission to adopt rules that require covered providers to omit calls or text messages to domestic abuse hotlines from customer-facing call records); *accord* 47 C.F.R. § 64.6408 (implementing same). Further, because the connectivity functionality is associated with the vehicle, rather than a particular person, it cannot be separated among users of the vehicle. Stated simply, in-vehicle connectivity offerings fall outside of the purview of the SCA and the problems associated with shared mobile service contracts that the SCA seeks to address.

Auto Innovators applauds the Commission for the swift and decisive steps it has taken to implement the SCA and help to ensure that domestic violence survivors across the country can maintain their independence and access to critical communications services when they need them most. We look forward to further conversations with the Commission about opportunities to keep drivers, including domestic abuse survivors, safe.

Respectfully submitted,



Hilary M. Cain
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