

WHAT THEY ARE SAYING:

STAKEHOLDERS URGE SWIFT IMPLEMENTATION OF DYNAMIC, LOCALLY LICENSED SHARING IN NATIONAL SPECTRUM STRATEGY COMMENTS



Spectrum for the Future

“A local licensing, shared framework at CBRS-like power levels in the lower 3 GHz band would promote the bottom-up innovation that America was built on, a type of innovation that our global economic competitors like the People’s Republic of China cannot match. Of note, complex, intelligent manufacturing operations across the U.S., including semiconductor fabrication plants, benefit from new competition that utilizes shared spectrum from the CBRS band to enhance their technical manufacturing work.”

Federated Wireless

“As the success of the CBRS band has shown, there are existing techniques and processes that can be readily adapted from CBRS to the 3.1-3.45 GHz band. While additional studies regarding incumbent systems are ongoing, work can and should commence in parallel to identify which CBRS sharing tools can be leveraged, adjusted, and optimized for the protection of incumbent 3.1-3.45 GHz systems.”

Celona

“A shared-license framework of the lightly used 3.1 GHz band (3.1-3.45 GHz) is very suitable if the NTIA decides not to relocate the incumbent users to other bands. In doing so, the NTIA can propose a spectrum use coordination system designed to mitigate the interference between incumbent users. The Spectrum Access System (SAS) and Automated Frequency Coordination (AFC) framework have proven immensely successful in other bands, like Citizens Broadband Radio Service (CBRS) and unlicensed sharing of the 6 GHz band.”

Dynamic Spectrum Alliance

“To meet growing demand in a timely manner, the DSA strongly urges NTIA to begin immediately to ‘modernize spectrum policy and make the most efficient use possible of this vital national resource’ by leveraging proven innovative licensing frameworks and dynamic spectrum management system (DSMS) tools and technologies. By harnessing the knowledge and experience that have made spectrum sharing a success in the Citizens Broadband Radio Service (CBRS) and 6 GHz bands, NTIA can expedite, streamline, and expand access to additional frequencies that are critical to U.S. industrial competitiveness, national security, and digital inclusion.”

“We already have significant experience from CBRS and 6 GHz sharing that can be readily adapted to specific conditions of the [lower 3 GHz, 7 GHz, and lower 37 GHz] bands with the aim of expanding access to these bands. There is no need to ‘reinvent the wheel’ to enable sharing of these frequencies. Rather, existing and proven DSMS sharing tools and processes should be optimized and augmented, as needed, to address the commercial and federal incumbent requirements in each band.”

Open Technology Institute at New America, Public Knowledge, and The Schools, Health & Libraries Broadband Coalition

“We specifically support the Administration conclusion that ‘[d]ynamic spectrum sharing is one key to meet these growing demands, and the United States is uniquely positioned to embrace a whole-of-Nation approach to advance the state of technology for dynamic forms of sharing.’ Accordingly, our groups urge NTIA to quickly determine which of the prioritized frequency bands can be shared for Federal and non-Federal use, and to implement an inclusive multistakeholder process that pursues a goal of open, widespread and intensive sharing of unused spectrum capacity.”

“...adapting the three-tier CBRS framework and Spectrum Access Systems already operating without interference to U.S. Navy operations is likely the most expeditious and productive way to make Federal radar and other bands below 3450 MHz available for 5G-capable networks and services for a very diverse range of users. And because the Department of Defense has so recently conducted an extensive study (PATHSS), we believe it should be possible for the Administration to fast track the identification of the 3100-3450 MHz band for coordinated sharing.”

Charter Communications

“Spectrum sharing enables a range of competing business models to meet an entity’s wireless needs, rather than forcing reliance on off-the-shelf services that a small number of vertically integrated service providers control or choose to offer. Although CBRS has been deployed for less than five years, it has already proven how shared spectrum can be the driver for advanced 5G that will be critical to maintaining U.S. leadership in wireless technology.”

“Quickly finalizing the applicable coordination framework for the 3.1 GHz band would allow the commercial sector and individual users to put this valuable spectrum to productive use while avoiding the expense and delay of disrupting and relocating DoD systems. A CBRS-like, lower-power, shared-licensed framework for the 3.1 GHz band allows highly valuable mid-band spectrum to be used to meet growing demands for 5G by a wide range of diverse users, while also ensuring robust protection of critically important DoD and other Federal operations.”

Comcast Corporation

“Comcast also commends the Strategy for identifying the 3.1-3.45 GHz (‘Lower 3 GHz’), 7125-8400 MHz (‘7/8 GHz’), and 37.0-37.6 GHz (‘Lower 37 GHz’) bands as part of this spectrum pipeline for expanded governmental and non-governmental use in the near term. Although the Strategy identifies these three priority bands as ‘meriting in-depth study in the near term,’ the Implementation Plan should leverage existing studies and review of these bands and coordinate with the Federal Communications Commission (‘FCC’) to take prompt action in making these bands available for commercial use via a coexistence framework.”

“The CBRS model provides a useful archetype for which to enable a coexistence framework in the Lower 3 GHz band, and NTIA should build on this success by acting promptly on the Lower 3 GHz band, while leveraging this approach.”

NCTA

“As NTIA develops its Implementation Plan for [the 3.1 GHz] band, it should build on the strong foundation developed in the two-year, multi-stakeholder PATHSS process. The goal should be to finalize the coordination framework and advanced mitigation features needed to allow commercial use of the spectrum. NTIA should not discard the extensive work that has already been conducted in the PATHSS process, pursue exclusive use approaches that involve incredibly costly and time-consuming relocations, or allow further delay in expanding shared-use frameworks where they are feasible.”

Lockheed Martin Corporation

“Using the 3.1-3.45 GHz, for example, DoD (and the DIB’s) operations should not be singled out for modification; the commercial mobile wireless industry must also be required to undertake operational modifications to achieve coexistence. Put differently, investment in coexistence technologies, such as dynamic spectrum sharing, should be required by all parties – and especially by proponents of reallocations.”

“Under certain circumstances, Federal and non-Federal coexistence within the lower 3 GHz may be possible with low-power 5G/NextG systems; such an outcome will clearly require future investment by the commercial mobile wireless industry. One such model, the Citizens’ Broadband Radio Service (‘CBRS’), is already operational in the 3.5 GHz band (3550-3700 MHz). The CBRS model is an important example of an initial framework that was designed to foster spectrum coexistence... there is ample opportunity for all parties to benefit from the evolution of the current CBRS model into the next generation of a spectrum coexistence framework.”

WISPA

“Undoubtedly, the proximity of [the 3.1-3.45 GHz] band to the CBRS spectrum that many WISPA members are using today to serve consumers in rural and other areas will ensure fast and intensive deployment as soon as appropriate technical and operating rules can be adopted. NTIA should expedite whatever additional study it believes may be necessary and conclude such study by December 2024.”