

WHAT THEY ARE SAYING:

Comments Regarding Potential Changes to Operating Parameters for the Citizens Broadband Radio Service (CBRS)



In response to the Federal Communications Commission's (FCC) November 2024 Notice of Proposed Rulemaking (NPRM) regarding further changes to operating parameters for CBRS, top stakeholders submitted comments cautioning against raising power limits and out of band emissions in the CBRS band. They also called on the FCC to preserve the unique sharing framework within CBRS, which has unlocked rapid investments in an ever-growing variety of competitive options for users in suburban, rural, and remote areas alike – while safeguarding mission-critical national security functions. See what they are saying on the issue:

Spectrum for the Future

“The modern, innovative CBRS approach implemented by the FCC has been an unmitigated success, helping consumers and a wide range of operators – from manufacturers to schools and libraries to new mobile providers – get the wireless connectivity they need, while also ensuring coexistence with critical national security operations. It has clearly established the U.S. as the global leader in spectrum management innovation and been a resounding success in terms of the collaboration between federal agencies and commercial interests sharing spectrum cooperatively. Raising power levels and out of band emissions limits would fundamentally change the nature of the CBRS band, jeopardize its future use, and undermine the trust of federal incumbents.”

The Association for Broadband Without Boundaries (WISPA)

“With more than 400,000 CBSDs registered with a Spectrum Access System ('SAS'), many of them deployed by WISPA members in rural communities where access and competition are lacking, CBRS is making a positive difference in broadband access. WISPA supports many of the Commission's proposals, but at this time opposes an increase in the maximum power level for Category B CBSDs... WISPA members should not be required to replace existing, relatively new equipment and purchase and deploy expensive high-powered base stations such as those used by mobile carriers in order to maintain their service areas... higher power also risks disrupting the delicate balance between federal incumbents and CBRS users. This is especially true after the recent changes agreed to by the Commission, the Navy, DoD, NTIA and industry stakeholders... colloquially called CBRS 2.0.”

Cambium Networks

“For a number of reasons, Cambium strongly opposes an increase in the power level for Category B outdoor CBSDs, or the introduction of another category of higher-powered CBSD... Smaller, rural providers that today use PALs and GAA to provide fixed services to rural consumers could see their investments sunk and their businesses reduced. That was not the purpose behind CBRS when the Commission created it, and the Commission should not effect a sea of change in CBRS going forward.”

Celona

“There are many existing commercial users in the CBRS band which are operating mission critical use cases with CBSDs already deployed and operational over the last few years. Addition of new CBSDs in the vicinity of these deployments with higher power than currently allowed, will create a lot of interference (for example in the GAA channels) and have detrimental impact to ongoing commercial operations... [the] CBRS band benefits greatly from spectral reuse due to the existing limits on the maximum transmit power of CBSDs. However, introduction of new classes of higher power CBSDs will greatly reduce the spectrum reuse benefits and ultimately runs the risk of the whole band becoming useless.”

The Internet & Television Association (NCTA)

“The Commission should reject proposals that would fundamentally alter the CBRS framework, including higher base station power levels and relaxed in-band emissions limits. Such changes would harm competition, degrade the consumer experience, disrupt the business plans and expectations of a multitude of stakeholders, and diminish U.S. competitiveness and global technological leadership.”

Lockheed Martin

“Lockheed Martin expresses concern that unilateral Commission action to increase power levels at this point, for the benefit of a small subset of stakeholders, essentially undermines not only the spirit of those efforts that resulted in CBRS 2.0, but potentially future ones as well. Second, other U.S. government agencies may also lose confidence in the spectrum study and allocation process if the resultant spectrum environment is subject to future change after the bands have been studied and reallocation decisions have been made.”

Miami Dade Aviation Department (MIA)

“We firmly believe that increasing power levels and emissions limits for CBRS devices would have unintended consequences that could negatively impact our ability to leverage this vital spectrum resource effectively. The potential for higher power levels and emissions limits to lead to market consolidation, with fewer vendors offering standardized solutions and reduced incentives to develop specialized applications like those used at MIA, is a serious concern. This shift risks stifling innovation and reducing the overall utility of the CBRS band. Furthermore, MIA relies on CBRS technology to support various critical systems. Increased interference could disrupt real-time communication with baggage handling systems, leading to delays, lost baggage, and potential safety hazards. Higher power levels and emissions limits could also degrade video quality from surveillance cameras or interfere with access control systems, compromising airport security.”

Monisha Ghosh (Professor of Electrical Engineering, University of Notre Dame)

“CBRS is densely deployed at currently authorized power levels and being used for applications that differ from MNO use cases. Increasing CBSD power will severely disrupt the existing performance of use-cases that leverage the frequency reuse that is enabled by these power levels. Further, it is unclear what the advantages of increased power are since we also demonstrate the throughput performance that can be obtained by opportunistically aggregating multiple CBRS channels at current power levels to obtain throughputs greater than that delivered over high-power C-band channels.”

Tarana Wireless

“Tarana is concerned that the contemplated proposals related to a significant increase in base station power levels would fundamentally alter the shared spectrum nature of the CBRS band. In these comments, Tarana will argue that such changes, if adopted, would likely impact critical services currently deployed in the band and stunt the growth of many existing and planned CBRS deployments, undermining significant capital infrastructure investment to date. More importantly, these changes would incentivize the deployment of lower capacity macrocellular network deployments, and smaller aggregate network investments by fewer participants.”