



UNITED STATES DEPARTMENT OF COMMERCE
National Telecommunications and
Information Administration
Washington, D.C. 20230

April 26, 2021

Mr. Ronald T. Repasi
Acting Chief, Office of Engineering and Technology (OET)
Federal Communications Commission
45 L Street, NE
Washington, DC 20554

Mr. Joel Taubenblatt
Acting Chief, Wireless Telecommunications Bureau (WTB)
Federal Communications Commission
45 L Street, NE
Washington, DC 20554

RE: Amendment of the Commission's Rules with Regard to Commercial Operations in
the 3550-3650 MHz Band (GN Docket Nos. 15-319 and 17-258)

Dear Mssrs. Repasi and Taubenblatt:

The National Telecommunications and Information Administration (NTIA) and the Department of Defense (DoD) have worked closely with the Federal Communications Commission (FCC) as it implements the rules governing Citizens Broadband Radio Service (CBRS) in the 3550-3700 MHz band in the above-referenced proceedings.¹ The collaborative approach taken by government and industry to share the 3.5 GHz band has enabled commercial access to this primary mid-band spectrum for 5G deployments.² This letter is to notify you of the required protection criteria for American Samoa.³

¹ See Wireless Telecommunications Bureau and Office of Engineering and Technology Establish Procedure and Deadline for Filing Spectrum Access System (SAS) Administrator(s) and Environmental Sensing Capability (ESC) Operator(s) Applications, GN Docket No. 15-319, Public Notice, 30 FCC Rcd 14170 (WTB/OET 2015); see also Promoting Investment in the 3550-3700 MHz Band, GN Docket No. 17-258, Notice of Proposed Rulemaking and Order Terminating Petitions, 32 FCC Rcd 8071 (2017).

² Letter from Charles Cooper, Assoc. Admin., Office of Spectrum Mgt., NTIA, to Ronald T. Repasi, Chief (Acting) OET, and Donald Stockdale, Jr., Chief, WTB, FCC (Jun. 23, 2020), available at https://www.ntia.doc.gov/files/ntia/publications/ntia_cbars_port_city_protection_letter_6-23-20_gn_dkt_no_17-258.pdf; [https://ecfsapi.fcc.gov/file/106232665129281/NTIA%20CBRS%20Port%20City%20Protection%20Letter%20\(6-23-20\)%20\(GN%20Dkt.%20No.%2017-258\).pdf](https://ecfsapi.fcc.gov/file/106232665129281/NTIA%20CBRS%20Port%20City%20Protection%20Letter%20(6-23-20)%20(GN%20Dkt.%20No.%2017-258).pdf); Letter from Charles Cooper, Assoc. Admin., Office of Spectrum Mgt., NTIA, to Ronald T. Repasi, Chief (Acting) OET, and Donald Stockdale, Jr., Chief, WTB, FCC (Jan. 22, 2020), available at <https://www.ntia.doc.gov/fcc-filing/2015/ntia-letter-fcc-commercial-operations-3550-3650-mhz-band>; <https://ecfsapi.fcc.gov/file/101220466714222/3.5%20GHz%20NTIA%20to%20FCC%20Letter%20GN%20Docket%20No.%2017-258.pdf>.

³ See 47 C.F.R. § 96.15(a).

The FCC has certified a Spectrum Access System (SAS) Administrator to operate in the 3650-3700 MHz band in American Samoa.⁴ Operation in the 3550-3650 MHz portion of the band in America Samoa is pending a determination as to what type of Dynamic Protection Area (DPA) is necessary to protect federal incumbent operations.⁵

The DoD completed an assessment of its systems and operational needs in American Samoa and has defined DPAs for the territory. In addition, the DoD has determined that instead of employing an Environmental Sensing Capability to protect the DPAs, a scheduling portal will be used, with portal-activated DPAs referred to as P-DPAs. Consistent with the methodology that is currently used to protect certain facilities in the contiguous United States, federal operations may schedule operations in the P-DPAs, in given frequency ranges, by way of the portal, similar to an online calendar. SASs are required to communicate with the portal on a regular basis and protect any P-DPA during scheduled activities. The additional protection requirements for American Samoa will be captured in the Portal DPA KML file (P-DPAS.kml) on NTIA's website.⁶

NTIA will continue working in collaboration with the Commission, DoD, and industry to protect the federal 3550-3700 MHz band radar systems while minimizing the constraints on CBRS operations. Should you have any questions, please contact me or Edward Drocella, Chief, Spectrum Engineering and Analysis Division, Office of Spectrum Management, at edrocella@ntia.gov or (202) 482-2608.

Sincerely,

Charles Cooper
Associate Administrator
Office of Spectrum Management

⁴ Federal Communications Commission, Public Notice, "Wireless Telecommunication Bureau and Office of Engineering and Technology Approve Spectrum Access System Administrator Federated Wireless for Full Scale Commercial Deployment in the 3650-3700 MHz Band in American Samoa," DA 20-438, GN Docket No. 15-319 (Apr. 21, 2020), available at <https://www.fcc.gov/document/wtb-and-oet-approve-federated-wireless-sas-american-samoa>. Federated is a certified SAS for full scale commercial deployment in the 3550-3700 MHz band in the contiguous United States, Alaska, Hawaii, Puerto Rico, and Guam.

⁵ *Id.* at 2.

⁶ The 3.5 GHz band KML files used by the SAS operators are available on NTIA's website: <https://www.ntia.doc.gov/fcc-filing/2015/ntia-letter-fcc-commercial-operations-3550-3650-mhz-band>.