


NTIA also stated in its initial comments that the scope of services in the contemplated 5030-5091 MHz band should be limited to the relevant allocation of aeronautical mobile (route) service (AM(R)S) communications.⁴ Even with this limitation, however, the additional communications traffic may present further challenges to radio astronomy services at defined locations. We accordingly would recommend that additional criteria be developed, should this proceeding continue, to minimize UAS impact to particular radio astronomy sites, especially from low-altitude operations.

Lastly, in its initial comments, NTIA recommended that the Commission require parties seeking a 5030-5091 MHz band spectrum license to certify they have the requisite FAA remote pilot certification.⁵ To further protect sensitive radio astronomy operations, we also recommend that the process for such certification include a test or similar effort to promote awareness of radio astronomy sites, where low-altitude line-of-sight operation should not be permitted without coordination.

Respectfully submitted,



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⁴ NTIA Comments at 3.

⁵ *Id.*