



May 19, 2023

Submitted via e-mail

Mr. Scott Blake Harris
Director, National Spectrum Strategy
National Telecommunications and Information Administration
U.S. Department of Commerce
1401 Constitution Avenue NW
Washington, DC 20230

**Re: Development of a National Spectrum Strategy;
Docket No. NTIA-2023-0003; 230308-0068**

Dear Mr. Harris,

On May 19, 2023, Aalyria Technologies, Inc. (“Aalyria”) met with NTIA staff to discuss its comments in the above-referenced Request for Comment on the development of a National Spectrum Strategy.¹ Aalyria was represented by the undersigned, Brian Barritt, and outside counsel, Jodi Goldberg of Sheppard Mullin Richter & Hampton LLP. NTIA was represented by Scott Harris, Derek Kholpin, Chris Mattingly, Paul Ransom, and Sean Spivey.

Aalyria gave a brief overview of the company followed by a presentation of its network orchestration platform, Spacetime, including a demonstration of how Spacetime predicts end-to-end link opportunities based on real-time availability, propagation, interference, and capacity limits. Aalyria also explained how Spacetime can be incorporated into existing networks through a northbound API, and discussed the development of a future east-west API to support secondary markets for sharing infrastructure and spectrum among users.

Please direct any questions to the undersigned.

Respectfully Submitted,

/s/ Michael Cheng

Michael Cheng
Chief Legal Officer
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Livermore, CA 94551

¹ See Development of a National Spectrum Strategy, Request for Comment, 88 Fed. Reg. 16244 (Mar. 16, 2023) (“RFC”).