



May 22, 2023

VIA ELECTRONIC DELIVERY

Stephanie Weiner
Acting Chief Counsel
National Telecommunications and Information Administration
1401 Constitution Ave., NW
Washington, DC 20230

**Re: National Spectrum Strategy Request for Comment,
 NTIA Docket No. 230308-0068¹
 Summary of National Spectrum Strategy Meeting**

Dear Ms. Weiner:

On May 3, 2023, representatives of Lockheed Martin Corporation (“Lockheed Martin”) met with staff from the National Telecommunications and Information Administration’s (“NTIA”) offices of the Assistant Secretary (“OAS”) and Spectrum Management (“OSM”) regarding the development of a National Spectrum Strategy (“NSS”).² The attendees of this meeting are reflected in Attachment A.

Lockheed Martin highlighted the value provided to the nation by Lockheed Martin and the broader aerospace and defense (A&D) industry, and how an effective NSS can help catalyze A&D industry innovation and improve spectrum governance.

Specifically, Lockheed Martin shared the following data:

- As an Employer:
 - Lockheed Martin employs over 116,000 employees; over 50% are science, technology, engineering, and mathematics professionals; 25% have advanced degrees, and 20% are veterans.
- Supporting the Domestic Manufacturing Base:
 - Lockheed Martin alone has over 13,300 suppliers (across every U.S. state), including 7,600 small businesses; and has committed \$34 billion to U.S. suppliers, including \$6.1 billion for small businesses.
- A Net-Exporter of U.S. Products:
 - Lockheed Martin’s 2022 Foreign Military Sales (“FMS”) totaled \$12.56 billion, and international sales totaled \$16.9 billion.

¹ *Development of a National Spectrum Strategy Request for Comment*, Docket No. 230308-0068 (rel. Mar. 16, 2023).

² Lockheed Martin further participated in both of the NSS listening sessions hosted by NTIA and filed written comments on the NSS request for comment. See Lockheed Martin Comments (filed Apr. 17, 2023).

- In 2022, U.S. A&D industry FMS totaled \$52 billion and Direct Commercial Sales (“DCS”) totaled \$153 billion.
- A&D products are relied upon not only by the United States, but also our allies around the world.
- As a National Asset:
 - Lockheed Martin alone invested \$3.4 billion in independent research & development in 2022.
 - Lockheed Martin focuses on the development of cutting-edge technologies, including 5G.MIL[®] solutions, artificial intelligence, autonomy, directed energy, cybersecurity, and spectrum dominance.

In discussing its spectrum principles, Lockheed Martin addressed how U.S. A&D industry products (e.g., radars) utilize—and require—globally harmonized spectrum allocations. Specifically, Lockheed Martin discussed the role globally harmonized spectrum plays in FMS and DCS. Further, Lockheed Martin emphasized how its spectrum requests are matched and right-sized to the requirements of the missions its products support. Finally, Lockheed Martin discussed the need for a paradigm shift regarding a spectrum pipeline, such that the pipeline is better understood to feed into *all* spectrum access models—not just auctions, and thus essentially exclusive licensed access, which ignores the broader needs of the U.S. economy, let alone the increasing requirements of federal agencies’ technology solutions.

Regarding catalyzing A&D industry innovation and modernizing spectrum governance, Lockheed Martin questioned the opportunities to improve NTIA’s implementation of the Spectrum Relocation Fund and emphasized the need to i) improve the overall domestic spectrum governance regime, ii) improve the preparation process for the ITU World Radiocommunications Conference, to include greater cross-stakeholder engagement by both the FCC and NTIA, and iii) ensure that A&D facilities are accommodated into future interference protection frameworks. Specifically, Lockheed Martin highlighted that while the 2020 America’s Mid-Band Initiative Team (“AMBIT”) report included protections from commercial wireless operations for Department of Defense (“DoD”) ranges,³ A&D contractor facilities—which conduct the research, development, testing, evaluation, and sustainment activities for DoD’s systems—were afforded no such protection, even though they require access to the same spectrum as DoD to ensure full system functionality prior to system delivery and to conduct major upgrades over the lifecycle of those systems.

Respectfully submitted,

/s/ Jennifer A. Warren

Jennifer A. Warren

Vice President, Civil & Regulatory Affairs

Lockheed Martin Corporation

Attachments

Cc: Scott Blake Harris (OAS)
C. Sean Spivey (OSM)

³ Specifically in the 3400-3550 MHz band.

Attachment A

May 3, 2023 Meeting Participants

Lockheed Martin Corporation:

Jennifer A. Warren
Ryan N. Terry
Andrew Farquharson

Office of the Assistant Secretary:

Scott Blake Harris, Senior Spectrum Advisor

Office of Spectrum Management:

C. Sean Spivey, Senior Policy Advisor