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21 June 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. 230308-0068  
Summary of National Spectrum Strategy Meeting**

Dear Ms. Weiner:

On 16 June 2023, Andrew Roy of Aviation Spectrum Resources Inc. (“ASRI”) met with Mr. Scott Harris and staff from the National Telecommunications and Information Administration’s (“NTIA”) offices of the Assistant Secretary and Spectrum Management regarding the development of a National Spectrum Strategy (“NSS”) and the written comments ASRI filed.<sup>1</sup>

During the meeting ASRI explained the approach taken to spectrum by the aviation industry, emphasizing the need to prioritize safety issues and evaluate them using worst case assessments when assessing potential changes to spectrum. The travelling public expects this level of scrutiny by aviation regulators and operators, or they would not fly. ASRI reinforced its initial written comments by emphasizing that, not only do different industries take different approaches to spectrum and therefore a ‘one size fits all’ approach to spectrum assessment is not feasible, but that common assumptions regarding effective spectrum usage by one industry may be radically different from what characterizes effective use by another.<sup>2</sup>

ASRI then explained how recent spectrum activities impacting aviation operations had informed its views on the NSS Request for Comment, including the need for early and active engagement from all involved federal agency and industry stakeholders to gather the necessary operational

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<sup>1</sup> See Development of a National Spectrum Strategy Request for Comment, Docket No. 230308-0068 (rel. 16 Mar 2023). *Also See* ASRI Comments on NTIA RFC National Spectrum Strategy (NTIA-2023-0003-0085), submitted 17 Apr 2023.

<sup>2</sup> For example, the pass-band requirements for filters may be very different between a communications system and a radar system. As another illustration, an aviation system may need to certify to and operate with 99.999999% system availability vs ‘typical’ availability and performance parameters applicable to commercial wireless services.

and technical parameters for study.<sup>3</sup> For example, scenario development is a critical component of aviation coexistence studies, requiring complex 3-dimensional scenarios for different aircraft with multiple equipment types and mission profiles operating in the presence of deployments of disparate radio systems, which can be a long process requiring input from multiple stakeholders.

Lastly, ASRI reinforced that those seeking to repurpose spectrum from other allocations/users should be scrutinized on their justification for why access to additional spectrum is needed. This would add credibility to any spectrum management process considering repurposing and another tool to ensure all industries/users are using what spectrum they have efficiently.

ASRI reiterates that it supports the development of processes to implement the principles described above in the NSS to ensure the RF spectrum is used to its maximum effect, while supporting a variety of disparate needs and maintaining a level playing field for all.

If there are any questions regarding the foregoing, please contact the undersigned.

Respectfully submitted,

/s/ Andrew Roy

Andrew Roy

Director of Engineering, ASRI

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<sup>3</sup> The complexities of modern RF systems mean this can often take longer than an NPRM 30, 45, or even 60 day comment period and should be gathered and preliminarily assessed first before moving into any formal comment window.