



January 2, 2024

Mr. Sean Conway  
Deputy Chief Counsel  
National Telecommunications and Information Administration

Re: Implementation of the National Spectrum Strategy

Dear Mr. Conway -

The OnGo Alliance is a coalition of over 140 member companies, including mobile operators, cable operators, managed service providers, mobile virtual network operators, fixed wireless operators, enterprises, and more. Our members have deployed 3GPP technology-based solutions (both 4G LTE and 5G NR) in the Citizens Broadband Radio Service (CBRS) band to enable in-building and outdoor broadband coverage and capacity expansion at massive scale. Since 2016, the OnGo Alliance and its members have focused time, energy, and innovation to develop reliable, secure, and cost-effective wireless services for the 3.5 GHz CBRS band. The Alliance also established an effective product certification program for OnGo ensuring multi-vendor interoperability, with over 90 models of CBRS base stations (CBSDs) having achieved OnGo certification to date.

The Alliance appreciates the opportunity to provide comments to the NTIA's Notice of Opportunity for Public Input<sup>1</sup> on the Implementation of the National Spectrum Strategy (NSS).<sup>2</sup> We share NTIA's assessment that "[d]ynamic spectrum sharing is one key to meet these growing demands, and the United States is uniquely positioned to embrace a whole-of-Nation approach to advance the state of technology for dynamic forms of sharing."<sup>3</sup> The CBRS experience is a shining example of the art of the possible with regard to dynamic spectrum sharing. Since the authorization of full commercial service in early 2020, more than 362,000 CBRS devices are in operation, accompanied by over 720 FCC-authorized end-user devices and a vast network of over 1,000 operators satisfying a wide range of use cases, including mobile broadband, fixed wireless access, and enterprise private networks – all on a shared basis under the management of commercial Spectrum Access System (SAS) technology and solutions.

The Alliance believes the industry-federal collaboration process successfully used in CBRS is a solid model for sharing in other bands, including those identified by NTIA in the NSS. While each band will have unique

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<sup>1</sup> Available at <https://www.ntia.gov/sites/default/files/publications/ntia-nss-implementation-public-notice.pdf>.

<sup>2</sup> Available at <https://www.ntia.gov/issues/national-spectrum-strategy>.

<sup>3</sup> Id at 1.



challenges, and while sharing techniques may be optimized to maximize commercial access without jeopardizing incumbent operations, the fundamental principles and capabilities that make the CBRS sharing framework a success can be ported to new bands. By leveraging the experience gained through the development and implementation of the CBRS sharing framework, NTIA will be better able to achieve its policies and priorities in the most timely fashion, including “those related to the economy, national security, climate, AI, health care, science, immigration, diversity, equity and inclusion, and restoring America’s global standing.”<sup>4</sup>

To this end, the Alliance urges NTIA to prioritize the study of sharing the 3.1-3.45 GHz band. Members of the Alliance participated for nearly two years in the Partnering on Advanced and Holistic Spectrum Solution (PATHSS) working groups to draft the Emerging Mid-band Radar Spectrum Study (EMBRSS) report. That report determined that “sharing is feasible if certain advanced interference mitigation features and a coordination framework to facilitate spectrum sharing are put in place.”<sup>5</sup> The Alliance and our members have the technical and commercial expertise and institutional knowledge necessary to develop and implement such a coordination framework and are anxious to put that knowledge to work to ensure that this critical spectrum can be accessed as quickly as possible. Given that sharing is indeed feasible in this band, we encourage NTIA to build upon the important work done in the PATHSS group, and engage the dynamic spectrum sharing experts that have made CBRS a success to on details of the coordination framework and solutions.

The Alliance and our members stand ready to work with NTIA, the other federal agencies, the Federal Communications Commission, and our fellow industry partners to ensure the vision articulated in the NSS becomes a reality.

Respectfully submitted,

/s/ Stephen Rayment

Stephen Rayment  
President

/s/ Preston Marshall

Preston Marshall  
Chair

January 2, 2024

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<sup>4</sup> Id. at 22.

<sup>5</sup> Id. at 6.