

April 17, 2023

Mr. Charles Cooper, Associate Administrator
Office of Spectrum Management
National Telecommunications and
Information Administration
U.S. Department of Commerce
Washington, DC

Re: Regulations.gov Docket No. NTIA-2023-0003

Dear Mr. Cooper:

Anterix, Inc. is pleased to submit the following Comments in response to the National Telecommunications and Information Administration (“NTIA”) request for comment on development and implementation of a National Spectrum Strategy (“NSS”) for the United States.¹ Radio frequency spectrum is fundamental to life in the United States -- it is integral to the facilities and services relied upon by consumers, industry, and government as they go about their day-to-day activities. America has been and must remain the international leader in developing and deploying the advanced wireless technologies that are the engine of the modern economy.

Although innovators continue to expand the range of usable spectrum, it is a finite resource. Simultaneously, innovators are developing new and/or improved technologies that can support a seemingly endless growth in potential use cases. Keeping pace with those advances is an ongoing challenge. Deriving maximum societal and economic value from useable spectrum will be greatly enhanced by adoption of a national spectrum strategy that is holistic in its perspective, taking into account the very broad range of uses and users that will benefit from access to it. Anterix therefore welcomes this NTIA initiative that, in

¹ NTIA NSS Request for Comments (“RFC”).

collaboration with the Federal Communications Commission (“FCC”) and other Federal agencies, is intended to plan for current and future spectrum needs.

Anterix is particularly pleased that NTIA has identified “industrial and commercial applications, (*i.e.*, manufacturing, agriculture, and utilities)” as among enterprises that are “spectrum reliant.”² Anterix has been working closely with many electric utilities in recent years. It is familiar with their need for access to private, licensed broadband spectrum as part of their effort to secure their critical infrastructure facilities from natural and man-made disasters as well as from cyberattacks at the same time they work to modernize the nation’s electric grid.

The RFC requests information about how to increase access to spectrum for future Federal and non-Federal requirements and what those requirements are. Since the demand for spectrum continues to outpace the available supply, a trend that shows no signs of diminishing, the RFC asks about approaches such as repurposing and spectrum sharing, each of which has been used by the FCC in certain bands. It suggests that improving the technological capabilities of deployed systems also might address spectrum access needs. Anterix believes that the Federal government needs all of these “tools” and more, in their spectrum “toolbox” if we are to stay ahead of the curve.

The current “repurposing” of the 900 MHz band (896-901/935-940 MHz) is an excellent example of a unique approach. The FCC, recognizing that private enterprise entities need access to licensed broadband services and technology to meet internal requirements, authorized creation of a 6 MHz broadband allocation within that 10 MHz band. The repurposing process is essentially based on voluntary negotiations. Since much of the 900 MHz spectrum is licensed to utilities, they are the natural prospective entities for migrating from their deployed narrowband systems to broadband technology.

² RFC – Background.

Anterix, as the largest holder in this 900 MHz band, is working with utilities across the nation in clearing the broadband segment for their use. Several major utilities have already reached agreement with Anterix to lease or purchase broadband spectrum and these more technologically advanced, capacity-rich systems are beginning to be installed. In fact, this opportunity to deploy private broadband systems designed, built, and operated by utilities has generated significant interest and resulted in creation of the Utility Broadband Alliance (“UBBA”) and the Utility Strategic Advisory Board (“USAB”). Thus, utilities are voluntarily repurposing their own spectrum and thereby creating access to technology needed to address their future needs.

It is apparent those needs include access to spectrum for offshore uses such as windfarms and for unmanned aircraft system (“UAS”) operations. Utilities have played an active role in current FCC proceedings involving both issues and have detailed the use cases these capabilities would address.³ Offshore windfarms are playing an increasingly vital role in meeting the nation’s energy requirements but require adequate spectrum resources to operate effectively. Deploying UAS rather than humans to monitor and manage the nation’s electric grid promises significant improvements in efficiency, speed, and, more important, safety both for utility personnel and for the public they serve. Spectrum allocations that allow flexible use, subject to appropriate interference-protection provisions, will greatly increase a band’s utilization while also advancing important U.S. energy initiatives, and can be another very beneficial tool to address spectrum demand.

Anterix fully supports NTIA’s initiative in exploring both future spectrum requirements and the means for allowing those needs to be satisfied. Undoubtedly there are bands where wholesale repurposing, clearing a band to make it available for an entirely different purpose and used by entirely different entities,

³ See *Facilitating Access to Spectrum for Offshore Uses and Operations*, WT Docket No. 22-204, Notice of Inquiry, 87 FR 38048 (2022); see also *Spectrum Rules and Policies for the Operation of Unmanned Aircraft Systems*, Notice of Proposed Rulemaking, WT Docket No. 22-323, FCC 22-101 (rel. Jan. 4, 2023).

will be necessary. There also will be instances where spectrum sharing can be implemented successfully. The 900 MHz band is an example of an approach that enables stakeholders to use their already authorized spectrum in a voluntary migration to more spectrally efficient, capacity-enhancing, and forward-looking technology. Allowing bands such as 900 MHz to have expanded authority, including for offshore access or drone usage, can also help address needs. These are additional tools that should be considered as NTIA, in conjunction with other Federal agencies, formulates the NSS needed to support the nation's continued economic growth and improve its global competitiveness.

Respectfully submitted,

ANTERIX, INC.

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