

April 17, 2023

Office of Spectrum Management
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. 230308-0068**

Motorola Solutions, Inc. (MSI) hereby replies to the National Telecommunications and Information Administration's (NTIA) request for public comment on the development and implementation of a National Spectrum Strategy for the United States.¹ In broad terms, NTIA seeks input from "interested stakeholders, including private industry (specifically including developers and end-users of spectrum-based technologies and services, and contractors for federal missions), academia, civil society, the public sector, and others" on its three proposed pillars of a National Spectrum Strategy.²

Through this latest effort to develop a National Spectrum Strategy, NTIA seeks public input to help inform the development of a national spectrum strategy, which is needed for the U.S. to plan effectively for its current and future spectrum needs. NTIA plans to help inform the development of a national spectrum strategy, which is needed for the U.S. to plan effectively for its current and future spectrum needs. NTIA explains that in collaboration with the Federal Communications Commission and in coordination with other Federal agencies, it intends to identify at least 1,500 megahertz of spectrum for in-depth study to determine whether that spectrum can be repurposed for more intensive use.

NTIA proposed framework for the National Spectrum Strategy is built upon three pillars. Pillar #1 seeks to provide structure for the development of a spectrum pipeline to ensure US leadership in spectrum-based technologies. A spectrum pipeline is defined as a process for identifying spectrum bands,

¹ *Development of a National Spectrum Strategy*, National Telecommunications and Information Administration, Docket Number: 230308-0068, (rel. March 16, 2023) ("*NTIA Request for Comment*"), available at <https://www.regulations.gov/document/NTIA-2023-0003-0001>.

² *Id.*

regardless of allocation (both federal and non-federal) that should be studied for repurposing to meet future requirements. NTIA seeks comment from stakeholders on both near-term and medium-term spectrum needs for various services and radio-based applications and what factors should be considered in identifying spectrum for the pipeline.

Pillar #2 of the proposed National Spectrum Strategy would focus on longer-term spectrum planning and how to ensure that affected stakeholders work together openly and transparently in an ongoing manner to share how user requirements are changing in order to optimize spectrum use. NTIA seeks comment on which groups or categories of affected stakeholders with interests in the development of the National Spectrum Strategy should be participating in a long-term spectrum-planning process?

Pillar #3 is the promotion of innovation and pursuit of technologies that expand the overall capacity or usability of the radiofrequency spectrum. To this end, NTIA seeks comment on what innovations and next-generation capabilities for spectrum management models (both licensed and unlicensed) are being explored today and are expected in the future to expand and improve spectrum access (and what are the anticipated timelines for delivery)?

MSI agrees with the NTIA that managing the provision of greater access to spectrum will help the United States continue to lead the world in advanced technology and enhance the country's national and economic security. For this reason, Motorola Solutions supports a national spectrum strategy to anticipate deficiencies and shortfalls in spectrum capacity for new and innovative services. However, the management, implementation, and oversight of the strategy must be both balanced and transparent so that the voices of all stakeholders are heard and taken into account.

As MSI stressed to the NTIA in 2019 during its consideration of the *Developing a Sustainable Spectrum Strategy for America's Future*,³ there is a continuing need for the U.S. spectrum management process to consider and support the highly specialized communications needs of certain Federal and non-Federal users through the provision of dedicated spectrum allocations for non-commercial networks and systems. Specialized communication systems designed for the Department of Defense, Department of Homeland Security, the Department of Justice, State as well as local public safety organizations, public utilities and industrial and critical infrastructure industries will operate more efficiently, more securely, more capably, and, in many instances, more economically, when operated on networks free of non-critical commercial traffic. Attempts to consolidate all mission-critical communications into shared commercial networks will result in compromised performance and introduce heightened security risks for critical government data and information.

With respect to the current initiative to develop a National Spectrum Strategy, Motorola Solutions recommends that the development of a spectrum pipeline focus on bands outside of the core allocations for private narrowband systems operating at 900 MHz and below. These bands are already heavily shared and densely populated and satisfy highly valued public safety requirements. Also, given the limited quantity of spectrum allocated for these services, any repurposing or further sharing would not add significantly to the administration's goal of identifying 1500 MHz for repurposing in the near and medium term. There is more opportunity for broadband applications in bands above and beyond 1 GHz.

In addition, MSI recommends that NTIA ensure that the interests of private network operators, including public safety, critical infrastructure, energy, industrial, and transportation sectors be well represented in the development of longer-term strategies under Pillar #2. The needs and requirements of this user community are broad and diverse and will require more than one entity to adequately express

³ *Developing a Sustainable Spectrum Strategy for America's Future*, National Telecommunications and Information Administration, Docket No. 181130999-8999-01, Comments of Motorola Solutions, Inc. (submitted Jan. 22, 2019).

their viewpoints when discussing long term spectrum needs. Motorola Solutions recommends that NTIA act accordingly when it selects future members of its CSMAC advisory committee.

Respectfully Submitted,

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