



UNITED STATES DEPARTMENT OF COMMERCE
National Telecommunications and
Information Administration
Washington, D.C. 20230

September 18, 2023

Mr. Ronald T. Repasi
Chief, Office of Engineering and Technology (OET)
Federal Communications Commission
45 L Street, NE
Washington, DC 20554

Mr. Joel Taubenblatt
Chief, Wireless Telecommunications Bureau (WTB)
Federal Communications Commission
45 L Street, NE
Washington, DC 20554

Re: Promoting Investment in the 3550-3700 MHz Band
GN Docket Nos. 15-319 and 17-258

Dear Messrs. Repasi and Taubenblatt:

By this letter, the National Telecommunications and Information Administration (NTIA) provides notice, as part of the above-referenced proceedings,¹ of its agreement that Spectrum Access System (SAS) administrators may adopt longer Citizens Broadband Radio Service Device (CBSD) reauthorization periods where doing so will not adversely affect federal operations in the 3.55-3.7 GHz band (3.5 GHz band). Currently, all CBSDs are reauthorized at least once every five minutes to ensure compliance with the Federal Communications Commission's (Commission) rules.² As described in greater detail below, we agree that extending this reauthorization period from 300 seconds to 24 hours in geographic areas and portions of the spectrum band that are outside of the scope of current federal operations will help to provide a more stable and predictable spectrum environment for Citizens Broadband Radio Service users while ensuring an interference-free environment for critical federal operations. This approach will also ensure that SAS administrators will be able to timely respond to instructions from the President of the United States, or another designated Federal government entity, issued pursuant to 47 U.S.C. § 606.³

¹ See, e.g., *Amendment of the Commission's Rules with Regard to Commercial Operations in the 3550-3650 MHz Band*, GN Docket No. 12-354, Report and Order and Second Further Notice of Proposed Rulemaking, 30 FCC Rcd 3959 (2015); *Amendment of the Commission's Rules with Regard to Commercial Operations in the 3550-3650 MHz Band*, GN Docket No. 12-354, Order on Reconsideration and Second Report and Order, 31 FCC Rcd 5011 (2016); *Promoting Investment in the 3550-3700 MHz Band*, GN Docket No. 17-258, Order, 33 FCC Rcd 4987 (WTB/OET 2018); *WTB And OET Approve Four Spectrum Access System Administrators For Full Scale Commercial Deployment In The 3.5 GHz Band And Emphasize Licensee Compliance Obligations In The 3650-3700 MHz Band Under Part 96*, GN Docket No. 15-319, Public Notice, 35 FCC Rcd 117 (WTB/OET 2020).

² See 47 CFR §§ 96.15(a)(4), (b)(4), 96.63. See also <https://winnf.memberclicks.net/assets/CBRS/WINNF-TS-0016.pdf>, Section 8.5 CBSD Grant Procedure.

³ See 47 U.S.C. § 606; 47 CFR §§ 96.15(a)(4), (b)(4), 96.63.

Consistent with our established coordination procedures for the 3.5 GHz band⁴ and the Commission's rules, NTIA requests that the Commission direct the SAS administrators to apply the following:

- For assignments in the 3.55-3.7 GHz band, CBSDs *outside* of Dynamic Protection Area (DPA)⁵ Neighborhoods⁶ may continue to transmit for up to 24 hours on the approved assignments without SAS re-authorization.
- For assignments in the 3.65-3.7 GHz band, CBSDs *inside* of DPA Neighborhoods may continue to transmit for up to 24 hours on the approved assignments without SAS re-authorization.
- For assignments that include any portion of the 3.55-3.65 GHz band, CBSDs *inside* of DPA Neighborhoods shall continue to transmit for no more than 300 seconds on the approved assignments without SAS re-authorization.⁷

NTIA and DoD have worked closely with the Commission as it has implemented rules governing the Citizens Broadband Radio Service in the 3.5 GHz band. With the Citizens Broadband Radio Service, the Commission established a ground-breaking spectrum-sharing paradigm that has enabled commercial access to mid-band spectrum for next generation wireless deployments (including 5G), demonstrating the success of a collaborative partnership among stakeholders in government and industry. This ongoing spectrum-sharing effort demonstrates how, collectively, we can move toward more dynamic sharing, while protecting key government systems that are vital for national security and other public services.

* * *

NTIA looks forward to continuing its collaboration with the Commission, DoD, and industry to protect the federal 3.5 GHz band radar systems while minimizing constraints on Citizens Broadband Radio Service operations. Should you have any questions, please contact me

⁴ See, e.g., Letter from Charles Cooper, Associate Administrator, Office of Spectrum Management, NTIA, to Ronald T. Repasi, Acting Chief, OET, FCC, and Donald K. Stockdale, Jr., Chief, Wireless Telecommunications Bureau, FCC (June 23, 2020) (on file in GN Docket No. 17-258) (Modifying protection criteria for 11 port facilities); Letter from Charles Cooper, Associate Administrator, Office of Spectrum Management, NTIA to Ronald T. Repasi, Acting Chief, OET, FCC and Joel Taubenblatt, Acting Chief, WTB, FCC (Aug. 14, 2023) (on file in GN Docket No. 17-258) (Providing notice of portal replacement).

⁵ This applies to all DPAs: P-DPAs and E-DPAs. <https://ntia.gov/fcc-filing/ntia-letter-fcc-commercial-operations-3550-3650-mhz-band>

⁶ NTIA Letter to FCC on Commercial Operations in the 3550-3650 MHz Band, GN Docket No. 12-354 (April 14, 2015) available at <https://www.ntia.gov/fcc-filing/ntia-letter-fcc-commercial-operations-3550-3650-mhz-band>.

⁷ See 47 CFR § 96.15(a)(4).

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or Edward Drocella, Chief, Spectrum Engineering and Analysis Division, Office of Spectrum Management, at edrocella@ntia.gov or (202) 482-2608.

Sincerely,

Charles Cooper
Associate Administrator
Office of Spectrum Management
National Telecommunications and Information
Administration