



April 17, 2023

**BY ELECTRONIC MAIL**

National Telecommunications and Information Administration

U. S. Department of Commerce

**Re: Comments of the Regional Airline Association to NTIA's Request for Comments on Development of a National Spectrum Strategy (Docket No. NTIA-2023-0003)**

Dear National Telecommunications and Information Administration:

The Regional Airline Association ("RAA"), on behalf of its members<sup>1</sup> appreciates the opportunity to submit these comments appreciates the opportunity to comment on the National Telecommunications and Information Administration's ("NTIA") Request for Comment regarding Development of a National Spectrum Strategy ("NITA RFC")<sup>2</sup>. First and foremost, the safety of our passengers and crew are the top priority for RAA and RAA members and we support partnerships and efforts to enhance air transport safety. We support the establishment of clear guidelines for allocation of radio frequency spectrum that facilitates the public good through expansion of communications technology and the recognition and preservation of aviation safety, community access, and critical radio frequency operations that support aviation communications and other instrumentation.

RAA is in full agreement with comments submitted by Aviation Spectrum Resources, Inc. (ASRI), in their separate filing.

It has taken approximately 2 years and the aviation industry has been scrambling and will still not fully meet the deadline set forth by the Federal Aviation Administration ("FAA"). RAA requests that NTIA look at these current issues still being experienced by the telecommunications companies in their 5G roll out in the C-Band and the challenges experienced in the aviation industry with safety concerns and difficult retrofit timelines. Mitigations currently in place to alleviate 5G C-band interference are voluntary and short term, RAA requests the FAA work with the Federal Communications Commission ("FCC") on long term or permanent enforceable solutions that allow the co-existence of a safe and reliable aviation system and 5G telecom services.

RAA also requests that NTIA evaluate proposed spectrum allocations critically especially when they have the potential to affect aviation systems, regardless of the spectrum owner being a public or private owner. Spectrum allocation proposals that are near or adjacent of the aviation spectrum have the potential to negatively affect aviation systems, so it is critical that communication between the FAA and the FCC work together from the proposal stage. Further, with the goal of safe operations coexisting with new telecommunication technology the spectrum allocation decisions need to include deliberations of the proposals and the possible costs that will be incurred by targeted stakeholders at the time of the spectrum auction.

RAA appreciates the opportunity to submit these comments to NTIA to ensure all parties to include reliable commercial communications and aviation industry safety can coexist. RAA's Member Airlines welcome the opportunity to work in partnership to address all safety concerns while preserving the integrity of the entire air transportation network in the United States.

Very Respectfully,

A handwritten signature in black ink that reads "Jennifer Iversen". The signature is written in a cursive, flowing style.

Jennifer Iversen  
Regional Airline Association  
Vice President, Aviation Operations and Regulatory Affairs

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<sup>1</sup> RAA Members are: Air Wisconsin Airlines, Champlain Enterprises CommutAir, Empire Airlines, Inc., Endeavor Air, Envoy Air, Inc., GoJet Airlines, Horizon Air, Hyannis Air Service, Mesa Airlines, New England Airlines, Piedmont Airlines, PSA Airlines, Ravn Alaska, Republic Airways Holdings, Inc., Silver Airways, SkyWest Airlines

<sup>2</sup> Docket No. NTIA-2023-0003