



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

April 19, 2018

Mr. Julius P. Knapp
Chief, Office of Engineering and Technology
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Mr. Donald Stockdale
Chief, Wireless Telecommunications Bureau
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

RE: Protection of the Table Mountain Radio Receiving Zone in the 3550-3700 MHz
Band (GN Docket Nos. 15-319 and 17-258)

Dear Messrs. Knapp and Stockdale:

The National Telecommunications and Information Administration (NTIA), working with the Federal Communications Commission (FCC), the Department of Defense (DOD), and industry representatives, has taken steps to help effectuate the rules governing the Citizens Broadband Radio Service (CBRS) in the 3550-3700 MHz band (3.5 GHz Band). The comprehensive regulatory scheme adopted by the FCC includes specific licensing, technical, and service rules to enable dynamic sharing between multiple tiers of federal and commercial users in the 3.5 GHz Band.¹ The Spectrum Access System (SAS) is a core component of this framework as the automated frequency coordinator necessary to maximize efficient and effective use of the band. In this letter, NTIA advises the FCC that NTIA expects an authorized SAS to ensure protection of the Table Mountain Radio Receiving Zone.

NTIA's Institute for Telecommunication Sciences (ITS) is the Department of Commerce entity with delegated responsibility for protecting the Table Mountain Radio Receiving Zone from possible harmful interference.² Field strengths of radiated signals from Citizens Broadband Service Devices (CBSDs) operating in the 3.5 GHz CBRS band that are received on this 1800 acre protected site should not exceed a power-flux density of -85.8 dBW/m² in the authorized

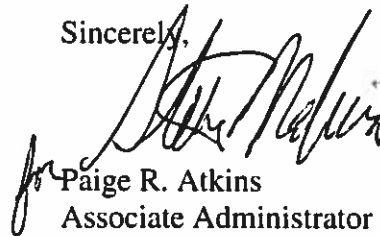
¹ See Amendment of the Commission's Rules with Regard to Commercial Operations in the 3550-3650 MHz Band, *Order on Reconsideration and Second Report and Order* in GN Docket No. 12-354 (rel., May 2, 2016).

² The Table Mountain Radio Receiving Zone is an 1800 acre site in the vicinity of the reference point at coordinates 40.130660 degrees North Latitude, -105.244596 degrees West Latitude. NTIA was originally delegated the authority to protect Table Mountain by the Secretary pursuant to Department Organization Order 10-10, § 4. The authority has since been codified in the NTIA Organization Act, 47 USC 902(b)(1), and delegated to ITS pursuant to Department Organization Order 25-7, § 7. See also Commerce Real Property Management Manual, § 2.2.2.

bandwidth of service.³ ITS has historically coordinated all proposed frequency assignments to stations, including assignments to stations established under group authority, within specified conditions of power and radial distances from the Table Mountain reference point. Under the FCC's Part 96 rules for the 3.5 GHz CBRS band, the SAS is the automated frequency coordinator for frequency, bandwidth, and power assignments for all CBSDs. As such, the only practical and effective way to ensure protection of the Table Mountain quiet zone from potential harmful interference from CBRS is for the FCC to require that the SAS have the capability and responsibility to protect Table Mountain and ensure that operation of CBSDs complies with the field strength limits specified in Section 1.924(b)(1) of the FCC's rules either by (1) the SAS acting as a substitute for the traditional licensee or applicant and coordinating the frequency, bandwidth and power of CBSDs on behalf of the CBSDs, or (2) the SAS withholding permission to transmit for any CBSD that could place a signal over Table Mountain in excess of the field strength limit in the bandwidth of service specified in Section 1.924(b)(1) of the FCC's rules without evidence of prior coordination with the Table Mountain Radio Frequency Coordinator.

Given its continued importance as a critical resource for sensitive radio and electromagnetic experiments, NTIA seeks concurrence from the FCC that, consistent with historical practice, for CBRS it will require a SAS to protect Table Mountain. We request that this letter be made part of the record in the relevant Commission proceedings, specifically GN Docket Numbers 15-319 and 17-258. NTIA looks forward to our continued collaborative efforts in completing the SAS approval process in order to realize the full sharing potential in the 3.5 GHz Band while protecting critical federal resources. If you have any questions, please contact me or Edward Drocella, Chief, Spectrum Engineering and Analysis Division, Office of Spectrum Management at edrocella@ntia.doc.gov or (202) 482-2608.

Sincerely,



Paige R. Atkins
Associate Administrator
Office of Spectrum Management

cc: Keith Gremban, ITS Director

³ NTIA Manual of Regulations and Procedures for Federal Radio Frequency Management, Section 8.3.20 (rev. Sept. 2015); 47 C.F.R. Section 1.924(b)(1).