

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

Office of Engineering and Technology and)	GT Docket No. 19-128
Wireless Communications Bureau Seek)	
Comment on Bidirectional Sharing Pursuant to)	
Ray Baum’s Act of 2018)	

COMMENTS OF THE BOEING COMPANY

The Boeing Company (“Boeing”) is a global leader in the design and manufacture of aircraft, defense, satellite, and other aerospace systems, both for commercial and governmental uses. Given its vast expertise in working with federal and non-federal spectrum, Boeing welcomes the opportunity to respond to the Public Notice (“PN”) from the Federal Communications Commission (“FCC” or “Commission”) Office of Engineering and Technology and Wireless Communications Bureau on bidirectional sharing.¹ Boeing supports bidirectional sharing, provided it is implemented via appropriate and transparent frameworks.

Boeing deploys a wide array of wireless systems for research and development, worker safety and automated manufacturing, aircraft flight testing, and incorporation within the operational systems of each aircraft, defense system, and space vehicle manufactured by Boeing. The company carries out major contracts with U.S. federal government agencies, including the Department of Defense and the National Aeronautics and Space Administration. These contracts often require the use of spectrum assignments issued by the National Telecommunications and Information Administration (“NTIA”) to those agencies for the development and testing of government aircraft, defense and aerospace systems and other devices that employ radio

¹ Office of Engineering and Technology and Wireless Communications Bureau Seek Comment on Bidirectional Sharing Pursuant to Ray Baum’s Act of 2018, Public Notice, GT Docket No. 19-128, DA 19-371 (rel. May 1, 2019) (“PN”).

frequency resources for monitoring and communications. In turn, these activities require licenses from the FCC, with approval from NTIA, and operate in U.S. Government spectrum.

Boeing's proficiency with these various federal and non-federal licensing regimes across various industry sectors leads it to support government efforts to implement transparent, appropriately-tailored bidirectional sharing frameworks. For example, bidirectional sharing is an important element in the President's long-term National Spectrum Strategy.² President Trump's Presidential Memorandum (the Memorandum) directs the Executive Branch Departments and Agencies to "continue to look for additional opportunities to share spectrum among Federal and non-Federal entities."³ The Memorandum directs the Secretary of the U.S. Department of Commerce, working through NTIA, to consult with the Office of Management and Budget, the White House Office of Science and Technology, and the FCC, to submit to the President a report on a long-term National Spectrum Strategy including recommendations to (1) "increase spectrum access for all users, including on a shared basis, through transparency of spectrum use and improved cooperation and collaboration between Federal and non-Federal spectrum stakeholders;" and (2) "build a secure, automated capability to facilitate assessments of spectrum use and expedite coordination of shared access among Federal and non-Federal spectrum stakeholders."⁴

Congress also has recognized the utility of bidirectional sharing. Section 610(a) of the RAY BAUM'S Act requires the FCC, in collaboration with NTIA, to conduct a study on

² Memorandum for the Heads of Executive Departments and Agencies, *Developing a Sustainable Spectrum Strategy for America's Future*, 83 FR 54513 (Oct. 30, 2018), available at <https://www.govinfo.gov/content/pkg/FR-2018-10-30/pdf/2018-23839.pdf>.

³ *Id.*

⁴ *Id.* at 54514.

bidirectional sharing, which is the subject of the instant PN.⁵ The intent of the study is to determine the best avenue for providing Federal users flexible access to non-Federal spectrum on a shared basis.⁶ Congress wisely directed the FCC “consider the regulatory certainty that commercial spectrum users and Federal entities need to make longer-term investment decisions for shared access to be viable.”⁷

Regulatory certainty requires transparent processes and equal treatment of all licensees of the same status (i.e. primary vs. primary) in the same bands. For instance, the Commission’s recommendations should acknowledge the benefits of band-specific bidirectional sharing rules to account for the differences between terrestrial, satellite, and other mobile systems. Congress correctly surmises that such parity will spur investment and innovation in spectrum technologies.

Boeing appreciates the opportunity to respond to this PN exploring the merits of bidirectional sharing, and it looks forward to working the FCC and other agencies to implement an open, light-touch framework.

Respectfully submitted,

THE BOEING COMPANY

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⁵ Repack Airwaves Yielding Better Access for Users of Modern Services (RAY BAUM’S) Act of 2018, Pub. L. 115-141, § 610, 132 Stat. 1080, 1108 (2018).

⁶ *Id.* at § 610(a)(1).

⁷ *Id.* at § 610(b)(1).