

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

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

COMMENTS OF THE AEROSPACE INDUSTRIES ASSOCIATION

The Aerospace Industries Association (AIA) is pleased to respond to comments on 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

As the PN states, the FCC is preparing its report to Congress that (1) addresses the regulatory certainty that commercial spectrum users and Federal entities need to make longer-term investment decisions for shared access to be viable; and (2) evaluates any barriers to voluntary commercial arrangements in which non-Federal users could provide access to Federal entities.²

INTRODUCTION

AIA is the voice of the American aerospace and defense industry. AIA represents nearly 340 leading aerospace and defense manufacturers and suppliers, supporting 2.4 million jobs and over \$800 billion in annual exports. Our members are supportive of bidirectional sharing provided that it is implemented in the appropriate manner.

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”).

² iBId.

DEVELOPING BIDIRECTIONAL SHARING REGIMES ARE CRITICAL TO MAXIMIZING SPECTRUM RESOURCES

On October 25, 2018 President Trump signed a memorandum that seeks to develop our nation's "National Spectrum Strategy".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 Policy, 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

In response to the memorandum, AIA filed comments expressing its support for establishing new and creative spectrum sharing regimes in order to maximize our nation's finite spectrum resource for emerging technologies like 5G. While AIA and its members are supportive of these new and creative sharing regimes, prior to establishing and initiating any new sharing regime, there must be proper compatibility studies and testing with the incumbent user – whether commercial or federal – of the individual spectrum band before any new sharing regime is initiated. Incumbent users should be encouraged to develop such sharing regimes in a collaborative fashion in bands and with new uses where sharing feasible. The studies and testing must account for both future

³ 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>.

⁴iBId.

and current spectrum needs of the incumbent user of and new entrant in the band, as well as the impacts that new uses will have on the adjacent spectrum bands.

AIA also commends various agencies for their innovative approach to look at new ways to share spectrum. For example, the Department of Defense (DoD) is one such agency that has shown willingness to share spectrum, where appropriate. The 3.5 GHz Citizens Broadband Radio Service (CBRS) band is one example of this approach⁵, but any new sharing regime presents complexities and takes time to develop. DoD has shown willingness to work through these complexities. AIA and our members believe that all agencies, including the FAA, and commercial users, including mobile wireless licensees, should emulate this approach and look to share spectrum where appropriate provided that it is suitable for the individual band itself.

As the Telecommunications Industries Association (TIA) correctly points out “the potential for bidirectional sharing is still in early exploratory stages” and that “[a]ny federal / non-federal sharing regimes will take time to develop”.⁶ While that is true, AIA and its members believe that the Commission should use this opportunity to recommend to Congress that it will explore what steps the Commission can take to create incentives for its commercial wireless to share its licensed spectrum, and to encourage its OEMs to invest in spectrum sharing technology. Setting up new sharing regimes is a complex task, but necessary to ensure that our nation maximizes our spectrum resources – both commercial and federal.

⁵ “Spectrum Sharing Model Gaining Ground.” Spectrum Sharing Model Gaining Ground | National Telecommunications and Information Administration, 1 May 2019, www.ntia.doc.gov/blog/2019/spectrum-sharing-model-gaining-ground.

⁶ Telecommunications Industries Associations Comments, GN Docket No. 19-128 (dated May 31, 2019)

Sharing regimes must also be band specific by necessity. As the Boeing Company correctly states, “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”.⁷ Each band needs to be looked at on a one-off basis, as some bands are better suited for sharing than others. Prior to any new sharing regime, the qualities of the specific band should be analyzed and then determined if that band is suitable for bidirectional sharing. The Commission should consider working with industry to develop prototype systems to validate the feasibility and quality of sharing the spectrum, in addition to engineering analysis. AIA and its members strongly believe that a “one sized fits all approach” is not suitable in this case and the FCC should work to ensure that each band is considered individually and that any sharing agreement is done to best serve that specific band.

CONCLUSION

AIA and its members applaud Congress and the FCC for its interest in bidirectional sharing and looks forward to the FCC report on this topic. Congress rightly recognized this issue in the Ray Baum’s Act by directing 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”.⁸ Developing proper, band-specific, bidirectional sharing regimes is an important element of our nation’s spectrum future. AIA and our members look forward to working with the FCC, NTIA, and Congress on this crucial topic – as it will only be a success if implemented in a truly bidirectional fashion.

⁷ The Boeing Company Comments, GN Docket No 19-128 (dated May 31, 2019)

⁸ 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).

Respectfully submitted,

AEROSPACE INDUSTRIES ASSOCIATION

A handwritten signature in dark ink, appearing to read 'D. Silver', written over a horizontal line.

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