

Before the  
**Federal Communications Commission**  
Washington DC 20554

In the Matter of	)	
	)	GN Docket No. 18-122
Expanding Flexible Use of the 3.7 to 4.2 GHz	)	
Band	)	RM-11791
	)	RM-11778
	)	DA 19-678

**COMMENTS OF COMMSCOPE**

CommScope, Inc files these comments on the Public Notice (PN) in the above-captioned docket.<sup>1</sup>

CommScope's Comsearch division has an over 42-year history of performing interference analyses and frequency coordination between earth stations and microwave systems across all commercial earth station/microwave shared bands. In addition, we support other types of sharing including developing a Spectrum Access System (SAS) and Environmental Sensing Capability (ESC) in the 3.5 GHz CBRS band, operating as an FCC-appointed database manager under light-licensing for the 70/80/90 GHz band, and developing a TV White Space database. We also have supported and provided services for relocation of the 2 GHz microwave bands in favor of PCS and AWS, and for repacking of the TV and 2 GHz BAS bands. Likewise, we intend to develop solutions to help implement whatever sharing, repacking, or relocation policies the FCC may choose for the mid-band spectrum.

CommScope also performed the analyses used by AT&T in their filing that is a subject of the PN.<sup>2</sup>

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<sup>1</sup> *Expanding Flexible Use in Mid-Band Spectrum Between 3.7 and 24 GHz*, GN Docket No. 17-183, Order and Notice of Proposed Rulemaking, 33 FCC Rcd 6915 (2018).

<sup>2</sup> *Ibid*

We thoroughly understand and appreciate the complexities of sharing as outlined in the FCC PN and as detailed in the associated filings. We think most of the proposals presented represent viable approaches to opening the band for broader shared use, but much more study is needed to arrive at a conclusion. We also support AT&T's conclusions outlined in their filing.<sup>3</sup>

CommScope believes that sharing could be possible by using a SAS or database that is aware of actual frequencies received by the earth stations and can suggest frequencies to wireless broadband systems that do not conflict. Having the ability to suggest frequencies in an alternate band (e.g. 3.5 GHz CBRS band) could be an effective strategy. To be sure, our experience with Spectrum Access Systems indicates that sharing with FSS systems is possible, but additional study is needed to determine the appropriate protection zones and sharing criteria. These types of sharing approaches could be used to facilitate both transitional or long-term sharing to more efficiently utilize the spectrum in the shared portions of the band.

Comsearch supports the Commission's efforts to identify and discuss methods for sharing and relocation/repacking options in the mid-band frequencies to encourage efficient and best utilization of spectrum. We have significant expertise, software resources and databases to help support these efforts.

Respectfully Submitted,

/s/ H. Mark Gibson

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<sup>3</sup> Letter from Henry Hultquist, Vice President, Federal Regulatory, AT&T Services, Inc., to Marlene Dortch, Secretary, FCC, GN Docket No. 18-122 (filed May 23, 2019), p17