

December 4, 2020

VIA ECFS

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

RE: *Written Ex Parte, MVDDS Use of the 12.2-12.7 GHz Band for Two-Way Mobile Broadband Service, RM-11768*

Dear Ms. Dortch:

Federated Wireless, Inc. (“Federated Wireless”) files this ex parte to reiterate its support for the Federal Communications Commission (the “Commission”) to move forward with a Notice of Proposed Rulemaking (“NPRM”) to explore the possibility of implementing flexible use of the 12.2-12.7 GHz band (the “12 GHz Band”), including fixed and mobile 5G wireless broadband services, and to respond to recent statements made by Space Exploration Holdings, LLC (“SpaceX”) regarding the ability for shared spectrum technology to address the challenges associated with protecting and preserving other authorized uses of the band.¹

As Federated Wireless noted in our previous filings, the success of the CBRS band, including the sharing framework that has been implemented to protect three different classes of incumbent users, is instructive to the discussion of sharing of the 12 GHz Band. Over a year of commercial CBRS operations without any reports of interference from itinerant federal, fixed satellite service (“FSS”), or point-to-multipoint incumbent users demonstrates that, while complicated, sharing amongst disparate users is both achievable and manageable.

In its filing, SpaceX raises concerns regarding the number of FSS receivers that would need to be protected, how consumer devices would be tracked and managed, and how privacy would be maintained. Federated Wireless acknowledges that these are challenges that will need to be addressed and that an NPRM is the appropriate vehicle for doing so. The challenges identified by SpaceX are not unique to the 12 GHz Band, however. The shared spectrum technology and system developed for the CBRS band is capable of both complex and high-volume computations. Sharing the CBRS band with the primary incumbent – the U.S. Navy – whose use is both itinerant and periodic (and highly sensitive from a security standpoint) requires significantly more complex calculations than would sharing of a band with fixed incumbent users. Furthermore, this same shared spectrum capability has been adapted to the 6 GHz band where a large number (over 100,000) of incumbent receivers operate and an even higher number of new entrant devices are anticipated (millions). So long as information about the incumbent

¹ See Letter from David Goldman, Director of Satellite Policy, SpaceX, to Marlene Dortch, Secretary, FCC, RM-11768 (filed November 6, 2020).

and new entrant users is available and up to date, the shared spectrum technology is capable of managing the computational requirements at scale.

Federated Wireless looks forward to lending our experience in implementing shared spectrum solutions in other bands and in response to other challenging situations to the 12 GHz Band. We continue to believe that it is possible to enable new and innovative uses of the 12 GHz Band, while also protecting incumbent operations. We encourage the FCC to move forward with an NPRM to seek comment on ways in which new terrestrial broadband services can be introduced while also allowing existing services to continue to operate and evolve unimpeded.

Respectfully submitted,

/s/ Jennifer M. McCarthy
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