

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

Expanding Flexible Use of the 3.7 to 4.2 GHz Band)	GN Docket No. 18-122
)	
)	
Expanding Flexible Use in Mid-Band Spectrum Between 3.7 and 24 GHz)	GN Docket No. 17-183
)	(Inquiry Terminated as to 3.7-4.2 GHz)
)	
Petition for Rulemaking to Amend and Modernize Parts 25 and 101 of the Commission's Rules to Authorize and Facilitate the Deployment of Licensed Point-to-Multipoint Fixed Wireless Broadband Service in the 3.7-4.2 GHz Band)	RM-11791
)	
)	
)	
Fixed Wireless Communications Coalition, Inc., Request for Modified Coordination Procedures in Bands Shared Between the Fixed Service and the Fixed Satellite Service)	RM-11778
)	

REPLY COMMENTS OF NORTHROP GRUMMAN CORPORATION

Northrop Grumman Corporation (“Northrop”) hereby submits these reply comments in response to the above-captioned Notice of Proposed Rulemaking (“NPRM”).¹ Northrop supports the C-Band Alliance market-based approach proposed in the NPRM as the only option that will improve the U.S. economy by unleashing “Fast 5G” wireless service, preserve vital C-Band fixed satellite service (“FSS”) communications, and boost space segment manufacturing.²

Northrop Grumman Innovation Systems, one of four sectors within Northrop, is a premier provider of space systems and next-generation solutions to our commercial customers and the U.S. government meeting customer needs with high-impact, best-value aerospace products, systems and services.

¹ See *Expanding Flexible Use of the 3.7-4.2 GHz Band*, Order and Notice of Proposed Rulemaking, GN Docket No. 18-122, FCC 18-91 (rel. July 13, 2018) (“NPRM”).

² *Id.*, at ¶¶ 66-97.

Northrop acknowledges that it expects manufacturing opportunities to arise, confirming from our modest viewpoint FCC Chairman Pai's assertion that "[s]eizing the opportunities of 5G is not incidental, but central to our ability to grow our economy, create new jobs, and unleash new services and applications that will raise our standard of living."³ Accordingly, Northrop supports the C-Band Alliance's market-based approach.⁴

To meet its 18-to-36-month clearing timeline, the C-Band Alliance specifies that "new satellites must be built and launched in time to complete all of the necessary transitions."⁵ Northrop is encouraged that the C-Band Alliance also indicated that all potential satellite manufacturers will be U.S.-based,⁶ which will boost American productivity and job growth.

For these reasons, Northrop urges the Commission to adopt the C-Band Alliance market-based approach without delay.

Respectfully submitted,



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³ See Ajit Pai, Chairman, FCC, Remarks at the 7th Annual Americas Spectrum Management Conference, at 1 (Oct. 3, 2018), *available at* <https://docs.fcc.gov/public/attachments/DOC-354392A1.pdf>

⁴ *Id.*, at i-ii.

⁵ C-Band Alliance, *Notice of Ex Parte Presentation*, GN Docket No. 18-122, at 2 (filed Nov. 19, 2018).

⁶ *Id.*