

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
)	
)	
Promoting Investment in the 3550-3700 MHz)	GN Docket No. 17-258
Band;)	
)	
Petitions for Rulemaking Regarding the)	
Citizens)	
Broadband Radio Service)	
To: Marlene H. Dortch		
Office of the Secretary, Federal Communications Commission		

COMSEARCH COMMENTS

Christopher R. Hardy
Vice President
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Date: December 28, 2017

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
)	
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Amendment of the Commission's Rules with)	GN Docket No. 12-354
Regard to Commercial Operations in the)	
3550- 3650 MHz Band)	
)	
)	
)	

To: Marlene H. Dortch
Office of the Secretary, Federal Communications Commission

COMSEARCH COMMENTS

In response to the above-mentioned *Notice of Proposed Rulemaking* (NPRM)¹,
Comsearch hereby submits the following comments.

I. INTRODUCTION

Comsearch, a CommScope Company applauds the Commission's continued efforts to make more spectrum available through the new Citizens Broadband Radio Service in the 3550-3700 MHz band (3.5 GHz band). As a conditionally approved, "first wave" SAS Administrator², we have been working with all stakeholders to develop rules, standards and guidelines that will help to ensure the SAS concept is successfully implemented for CBRS. In general, Comsearch supports rules changes that will promote greater investment in the CBRS band and will preserve

¹ FCC 17-134, 32 FCC Recd. 8071, released October 24, 2017 (NPRM).

² DA 16-1426, 31 FCC Recd. 13355, released December 21, 2016 "3.5 GHz SAS Conditional Approval Public Notice" (SAS Selection PN).

the investment already made and we strongly believe that CBSD registration information should remain protected for the reasons detailed below.

II. CBSD REGISTRATION INFORMATION SHOULD REMAIN PROTECTED

We specifically concur with the Commission’s decision to prohibit SAS Administrators from publicly disclosing CBSD registration information. We agree with commenters whose sensitive data could be publicly exposed that there is no compelling reason to disclose such information to the general public.³ We note the arguments made by public advocacy groups that, “... making this data public helps hold SAS Administrators and other stakeholders accountable for responsibilities such as military radar protection and ensuring that valuable PAL spectrum does not lie fallow.”⁴ are specious in light of the FCC Rules. The “use-it-or-share-it” concept is well established in the FCC Rules such that PAL spectrum is available for GAA unless it is claimed by a PAL licensee through a PAL Protection Area, which requires that a CBSD be registered on a SAS.⁵ In addition, the Commission is working with SAS Administrators and other stakeholders to develop a mechanism to address and remedy reports of interference and report interference and its resolution (if any) to the Commission upon request.⁶

We also note that the Spectrum Sharing Committee of the Wireless Innovation Forum (whose members represent a broad participation among CBRS stakeholders) has published a list of information that SAS Administrators must share with the public.⁷ To the extent that this information is not sufficient for operators to assess whether there is enough available spectrum in

³ See AT&T Reply Comments at 8; T-Mobile Reply Comments at 21 and Verizon Comments at 9. See also CTIA Comments at 7; 5G Americas Comments at 13; Ericsson Comments at 8 and Nokia Comments at 8.

⁴ NPRM at ¶35.

⁵ See 47 CFR §96.25(c)

⁶ SAS Selection PN at 5.

⁷ “Requirements for Commercial Operation in the U.S. 3550-3700 MHz Citizens Broadband Radio Service Band”, Working Document WINNF-TS-0112 Version V1.3.0, September 27, 2017.

an area to support a deployment, they are free to contact any of the SAS administrators and communicate with the administrator on a confidential basis.

III. CONCLUSIONS

We believe strongly that that CBSD registration information should remain protected. As stated above, there are numerous means to address interference among CBRS users and allow information for operators to assess whether there is enough available spectrum in an area to support a deployment. As a SAS Administrator, we remain committed to the success of CBRS.

Respectfully Submitted,

/s/ Christopher R. Hardy

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