

T-Band Order and Public Notice



Order waived narrowband requirement for 470-512 MHz licensees

- **Positive step**
 - Allows 25 kHz to be added to “devices in production”
 - However, no provision for new certifications
- **Without additional relief on new certifications:**
 - T-band licensees will not have access to equipment with improved features and functionality
 - Licensees’ equipment and maintenance costs will go up, as equipment ages
 - Allowing access to new equipment provides migration capability for incumbent licensees
- **Bottom line: without ability to obtain and deploy more advanced equipment, overall system costs to T-band licensees will substantially increase as they wait years to relocate**

Public Notice froze new/substantially modified license applications

- **Freeze on new license applications makes sense**
 - Avoid introducing new licensees, or new deployments, into the band
 - However, limits on license modifications raises concerns
- **Strict freeze on modifications will harm incumbents**
 - Licensees may be prevented from deploying new equipment, even if already purchased
 - Over a decade, licensee’s operational requirements could merit limited expansion of spectral or geographic requirements
 - Limitation on geographic footprint could prevent licensees from upgrading from Analog to Digital technology
 - Even the relocation of antenna sites could be barred, potentially increasing costs to licensees
- **At a minimum, be generous in granting waiver requests**
 - Expedited consideration, allowing for reasonable technical, spectral or geographic expansion
 - Consider longer term benefit incumbents resulting from modest expansions in network capability