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

In the Matter of		
Lower 37 GHz Band	)	WT Docket No. 24-243
	)	
Use of Spectrum Bands Above 24 GHz for Mobile Radio Services	)	GN Docket No. 14-177
	)	
	)	
	)	
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COMMENTS OF THE DYNAMIC SPECTRUM ALLIANCE

The Dynamic Spectrum Alliance (DSA)[1] hereby submits these comments in response to the Further Notice of Proposed Rulemaking (FNPRM) in the above-captioned proceeding seeking comment on the possibility of replacing the coordination framework adopted in the Report and Order and Sixth Report and Order (Report and Order) with a dynamic spectrum management system (DSMS) to facilitate efficient sharing of the 37-37.6 GHz band (Lower 37 GHz band) among federal and non-federal users.

In the Report and Order the Commission acknowledges that commenters argue that a DSMS could provide a more efficient solution for spectrum sharing in this band than would the coordination

[1] The Dynamic Spectrum Alliance is a global, cross-industry alliance focused on increasing dynamic access to unused radio frequencies. The membership spans multinational companies, small- and medium-sized enterprises, academic, research, and other organizations from around the world, all working to create innovative solutions that will increase the utilization of available spectrum to the benefit of consumers and businesses alike. A full list of the DSA members is available on the DSA's website at www.dynamicspectrumalliance.org/members/.

approach the Commission adopted.[2] However, the Commission noted that, at this time, the record does not support one specific DSMS model nor identify the parameters that would be required to implement a DSMS. The Commission instead decided to adopt a Phase One/Phase Two framework that does not foreclose the adoption of a DSMS in the future. In the FNPRM, the Commission seeks comments on the possibility of replacing the adopted coordination framework with a DSMS.

One of DSA's primary goals is to increase spectrum access through shared and more efficient use. Achievement of this goal is possible through the use of automated DSMS technology and tools that actively manage new entrants' access to maximize use of spectrum to ensure protection of incumbents and facilitate coexistence among new users.

The DSA strongly supports the adoption of an automated sharing coordination approach that relies on DSMS capabilities that have already proven to be successful at enabling sharing between federal and non-federal users and at maximizing access by a wide range of new users.

The DSA's members have extensive experience in the development and implementation of innovative, non-exclusive licensing frameworks, supported by automated DSMS tools. We believe that the experience gained from these shared bands can be tailored to meet the specific opportunities and challenges of the Lower 37 GHz band. Use of automated DSMS management lowers transaction costs, uses spectrum more efficiently, speeds time-to-market for new services, protects incumbents from interference with greater certainty, and generally expands the supply of wireless connectivity. It can also incorporate technology-based sensing and other techniques, such as MIMO (multiple-input multiple-output) and beamforming antennas, to ensure spectrum is being used efficiently and

[2] *Lower 37 GHz Band, Use of Spectrum Bands Above 24 GHz for Mobile Radio Services*, WT Docket No. 24-243, Report and Order, Sixth Report and Order, and Further Notice of Proposed Rulemaking, WT Docket 24-243, GN Docket No. 14-177, at par. 27 (rel. Apr. 28, 2025) ("FNPRM").

intensively by multiple operators on a sector-by-sector basis without the need to establish first-in-time rights. Automating the process for coordination and coexistence through proven spectrum management tools will more readily achieve the Commission's objectives for the 37 GHz band while leveraging the significant investment made in DSMS capabilities and tools that have already proven to be effective and efficient at enabling sharing between federal and non-federal users.

Respectfully submitted,

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Dynamic Spectrum Alliance

July 14, 2025