Dynamic Spectrum Alliance Limited
http://www.dynamicspectrumalliance.org

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

In the Matter of	)	
	)	
World Radiocommunication Conference Advisory Committee for WRC-27	)	OIA Docket No. 24-30
	)	

COMMENTS OF DYNAMIC SPECTRUM ALLIANCE

The Dynamic Spectrum Alliance[1] (DSA) submits these comments in response to the Federal Communication Commission's (Commission) Public Notice in the above-captioned proceeding.[2] DSA encourages adoption of View B for 2027 World Radiocommunication Conference (WRC-27) agenda item 1.7 as U.S. positions are finalized ahead of upcoming regional WRC-27 preparatory meetings. For spectrum in the 7.125-8.4 GHz frequency range, View B calls for no change (NOC) for the 7.4-8.4 GHz segment consistent with the 6G spectrum-related provisions in the One Big Beautiful Bill Act (OBBBA) and December 2025 Presidential Memorandum *Winning the 6G Race*;[3] and would defer any International Mobile Telecommunications (IMT) identification for the 7.125-7.4 GHz segment until completion of domestic and international studies currently in process.

The Commission Should Recognize the Strategic Value of the 7.125-8.4 GHz Frequency Range.

Spectrum within the 7.125-8.4 GHz range offers tremendous value to U.S. economic competitiveness and national security. Spectrum within this range is generally allocated on a primary basis worldwide to the fixed, fixed-satellite, mobile-satellite (including maritime mobile-satellite), space research, Earth exploration-satellite (EESS), and meteorological-satellite services.[4] The physical propagation characteristics of these frequencies driving incumbents' operations are unique and not easily found in other spectrum bands.

Functionalities at the core of American innovation and national security are supported by this spectrum, including military, civil, and commercial remote sensing missions. These operations enable life-saving disaster management, early warning systems, and rapid emergency response to

[1] The DSA is a global, cross-industry, not for profit organization advocating for laws, regulations, and economic best practices that will lead to more efficient utilization of spectrum, fostering innovation and affordable connectivity for all. Our membership spans multinationals, small-and medium-sized enterprises, as well as academic, research and other organizations from around the world all working to create innovative solutions that will benefit consumers and businesses alike by making spectrum abundant through dynamic spectrum sharing. A full list of DSA members is available on the DSA's website at: https://www.dynamicspectrumalliance.org/members.

[2] *See Office of International Affairs Seeks Comment on Recommendations Approved by the World Radiocommunication Conference Advisory Committee*, OIA Docket No. 24-30, Public Notice, DA 26-182 (OIA rel. Feb. 23, 2026) ("WAC PN").

[3] *See* One Big Beautiful Bill Act, Pub. L. No. 119-21, 139 Stat. 72 § 40002(b)(1)(B) (2025) (OBBBA); Presidential Memorandum, *Winning the 6G Race* § 2 (Dec. 19, 2025), https://www.whitehouse.gov/presidential-actions/2025/12/national-security-presidential-memorandum-nspm-8-0bda/ (Presidential Memorandum).

[4] *See* 47 C.F.R. § 2.106.

events such as hurricanes and wildfires. They are essential for monitoring critical infrastructure, identifying underground minerals and resources, and detecting and responding to national security threats.

The 7.125-8.4 GHz range frequency range is also the home of a vibrant and highly successful unlicensed ecosystem (including personal item tracking devices, vehicle systems enabling proximity-based features, and smart-home/smart-office access controls that support secure, hands-free entry). While unlicensed services operate on a non-interference, non-protected basis, they provide substantial contributions to U.S economic and technological leadership that warrant consideration. These extremely low power unlicensed systems also have successfully coexisted without threat of harmful interference to the federal incumbent uses of this spectrum – a true spectrum sharing success story.

Given the importance of the functionalities enabled by incumbent missions and unlicensed uses to American's daily lives, as well as to U.S. economic and technological competitiveness, careful consideration should be given to any action (i.e., introduction of new IMT services) that could upend this well-functioning sharing ecosystem. With this in mind, View B on WRC-27 agenda item 1.7 is the best choice for the 7.125-8.4 GHz.

The Commission Should Seek to Maintain a NOC Position for the 7.4-8.4 GHz Segment

View B for agenda item 1.7 is consistent with domestic law, standing alone among the alternatives considered by the World Radiocommunication Conference Advisory Committee.

The OBBBA directs identification of 800 megahertz of spectrum for 6G in the 7.125-7.4 GHz segment (among others outside the 7.125-8.4 GHz frequency range) while expressly excluding the 7.4-8.4 GHz segment from any domestic reallocation and auction.[5] View C, however, directly contradicts the tenets of the OBBBA by advocating for a broad IMT tuning-range approach across 7.125-8.4 GHz,[6] ignoring the fact that Congress expressly sought to protect the 7.4-8.4 GHz segment.

Views A and C also would prejudge the results of ongoing domestic and international studies. In December 2025, President Trump released a Presidential Memorandum directing NTIA to begin studying operations in the 7.125-7.4 GHz frequency range with an eye to determining how to relocate certain affected federal systems to other segments, including 7.4-8.4 GHz.[7] Results of those studies are to be available "no later than 12 months from the date" of the Presidential Memorandum (i.e., December 19, 2026).[8] Separate ITU studies (from other administrations) also have not yet reached completion. Thus, consideration of the 7.125-7.4 GHz segment is premature; data-informed sharing conditions cannot be developed without running the needlessly substantial risk of disrupting important incumbent services.[9]

The Commission also should reject WAC Views A and C because they both ignore express prohibitions in Resolution 256 on layering on additional regulatory or technical constraints on incumbent services.[10] Views A and C would press for IMT identification without regard for technical

[5] *See* OBBBA § 40002(b)(1)(B).
[6] *See* WAC PN at 15-19 ("View C").
[7] *See* Presidential Memorandum § 2.
[8] *See* Presidential Memorandum § 2(b).
[9] *See* View B.
[10] *See* Resolution 256 at *resolves* 2.

protection for incumbent operations[11] and arbitrarily extend identification from 7.125 GHz to 7.45 GHz, not 7.4 GHz.[12] Taken together, WAC Views A and C exceed international mandates, impose new regulatory and technical burdens on incumbent services, and force consideration of frequency segments that are not contemplated for certain ITU regions.[13]

Conclusion

For the reasons above, DSA encourages adoption of View B for WRC-27 agenda item 1.7, which best serves U.S. economic, technological, and national security interests.

Respectfully submitted,

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President
Dynamic Spectrum Alliance

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[11] *See* WAC PN at 6-8 ("View A"), View C.
[12] *See* View A.
[13] Consideration of IMT identification in portions of the 7.4-7.75 GHz segment (i.e., for Region 1) exceeds the scope of agenda item 1.7.