Before the

FEDERAL COMMUNICATIONS COMMISSION

Washington, D.C. 20554

In the Matter of	)	
	)	
Facilitating More Intensive Use of Upper Microwave Spectrum	)	SB Docket No. 25-305
	)	
	)	

REPLY COMMENTS OF THE DYNAMIC SPECTRUM ALLIANCE

The Dynamic Spectrum Alliance[1] (DSA) hereby submits these Reply Comments in response to the Federal Communication Commission's (FCC or the Commission) Notice of Proposed Rulemaking (NPRM) in the above-captioned proceeding.[2] The DSA strongly supports the Commission's efforts to facilitate more intensive use of the bands above 24 GHz that are shared between the terrestrial Upper Microwave Flexible Use Service (UMFUS) and fixed satellite service (FSS) and its proposal to replace the cumbersome manual coordination rules of

[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] *Facilitating More Intensive Use of Upper Microwave Spectrum*, SB Docket No. 25-305, Notice of Proposed Rulemaking, FCC 25-70 (rel. Oct. 29, 2025) (NPRM).

Section 25.136 with a streamlined light-licensing framework and automated database coordination across all UMFUS bands.

The record in this proceeding shows broad support for reform of the coordination rules from satellite operators,[3] emerging space entrants,[4] public interest advocates,[5] and technology groups.[6] Moreover, the record as well as real-world experience in other bands (e.g., 6 GHz and Citizens Broadband Radio Service), demonstrate that a unified light-licensing framework along with automated frequency coordination can ensure incumbent protection, reduce administrative burdens on operators and the Commission, accelerate deployment of next-generation broadband services, and maximize efficient use of spectrum.

As noted by multiple commenters,[7] the physical characteristics of the UMFUS bands will facilitate sharing between terrestrial and satellite services. The bands' limited propagation range, significant atmospheric attenuation, use of highly directional antennas, and terrain/building shielding are all factors that can facilitate coordination and minimize interference risk between terrestrial and satellite services.

The record also shows significant support for the adoption of a lightly-licensed framework together with a link-registration database, such as the one currently used for

[3] *See* Comments of Amazon Leo, SB Docket No. 25-305, (filed Jan 20, 2026) (Amazon Comments); Comments of Space Exploration Holdings, LLC, SB Docket No. 25-305, (filed Jan 20, 2026) (SpaceX Comments); Comments of Eutelsat S.A. and WorldVu Satellites Limited, SB Docket No. 25-305, (filed Jan 20, 2026) (Eutelsat Comments).
[4] *See* Comments of Logos Space Services, Inc., SB Docket No. 25-305, (filed Jan 20, 2026) (Logos Comments); Comments of Commercial Space Federation, SB Docket No. 25-305, (filed Jan 20, 2026) (CSF Comments).
[5] *See* Comments of Open Technology Institute at New America, Public Knowledge, SB Docket No. 25-305, (filed Jan 20, 2026) (OTI/PK Comments).
[6] *See* Comments of The Computer and Communications Industry Association (CCIA), SB Docket No. 25-305, (filed Jan 20, 2026) (CCIA Comments).
[7] *See* Space X Comments at p. 3; *see* also OTI/PK Comments at p. 14; Amazon Comments at p. 12.

terrestrial fixed links in the 70/80/90 GHz bands, to support sharing between the services.[8] As SpaceX notes, "a light-licensing framework is simple, effective, and ready-to-deploy with minimal, straightforward updates."[9] Similarly, Amazon correctly observes that a light-licensing framework could "replace Section 25.136's complex technical criteria and manual coordination requirements with a streamlined automated database system," which "would dramatically reduce processing times by automating the initial interference analysis that currently requires manual calculations and extensive documentation, while providing greater transparency to both FSS and UMFUS operators…"[10] The DSA's experience with the Automated Frequency Coordination (AFC) system in 6 GHz band and with the Spectrum Access System (SAS) in CBRS confirms that automated databases successfully manage dynamic coexistence among disparate services while streamlining access, minimizing administrative burdens, and facilitating innovation.

To achieve the Commission's goals of promoting more efficient and intensive use of the UMFUS bands while improving its licensing processes so they scale with increased demand, we encourage the Commission to leverage the extensive work and experience to date in implementing shared spectrum frameworks for other bands, such as CBRS, 6 GHz and 70/80/90 GHz, which would result in a win-win for all parties. A proven light-licensing framework with automated database coordination will ensure successful coexistence, accelerate both satellite and terrestrial deployments, reduce administrative costs, and maximize efficient use of spectrum.

[8] See Amazon Comments at p. 6; *see* also OTI/PK Comments at p. 14; Logos Comments at pp. 4-5; CSF Comments at pp. 2-3; Eutelsat Comments at p. 3; CCIA Comments at p. 2.
[9] See SpaceX Comments at p. 2.
[10] See Amazon Comments at p. 6.

The DSA urges the Commission to adopt this modernization without delay to unlock the UMFUS bands' full potential.

Sincerely,

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President
Dynamic Spectrum Alliance