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

Before the

FEDERAL COMMUNICATIONS COMMISSION

Washington, D.C. 20554

In the Matter of	)	
	)	
Upper C-band (3.98–4.2 GHz)	)	GN Docket No. 25-59
	)	
	)	

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] As other commenters have proposed,[3] the DSA encourages the Commission to facilitate more intensive use of the Upper C-band (3.98-4.2 GHz) through a shared framework after the Upper C-band transition is complete.

[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] *Upper C-band (3.98–4.2 GHz)*, GN Docket No. 25-59, Notice of Proposed Rulemaking, FCC 25-78 (rel. Nov. 21, 2025) (NPRM).

[3] *See* Comments of Open Technology Institute at New America and Public Knowledge, GN Docket No. 25-59, (filed Jan. 20, 2026) (Comments of OTI/PK), encouraging the Commission to enable new flexible use in the lower portion of the band and authorizing shared use by mobile satellite direct-to-device services in the upper portion; *see* also Comments of Professor Monisha Ghosh, Joshua Roy Palathinkal, Dr. Muhammad Rochman, S. M. Haider Ali Shuvo, GN Docket No. 25-59, (filed Jan. 21, 2026) (Comments of Monisha Ghosh), urging the Commission to allow terrestrial wireless deployments in remaining FSS spectrum by leveraging the successful sharing mechanism used in the CBRS band.

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For example, by implementing a lightly-licensed framework and automated frequency coordination, flexibility for remaining Upper C-band FSS operations could be preserved and protection of adjacent band services maintained while still enabling vastly greater use of the band for new services, such as terrestrial fixed wireless services.

As the DSA stated in the 2019 C-band proceeding, "Commission rules already provide for similar databases in more complicated and dynamic spectrum sharing environments, such as the CBRS and broadcast television bands…Existing database technology can support coordination analyses of FSS operations, including changes to transponder and frequency use..."[4] Monisha Ghosh similarly notes, "[t]he Spectrum Access System (SAS) developed for CBRS can be easily extended to determine appropriate power levels for new devices in this band such that no harmful interference occurs to both in-band (FSS) and adjacent band (altimeters) incumbents."[5] Comsearch, which has extensive experience in database-enabled relocation/repacking of the Lower C-band, also indicates its support for the "Commission's efforts to identify and discuss various methods for sharing and relocation/repacking options in the Upper C-Band to encourage efficient and best utilization of spectrum."[6] In response to the Commission's Notice of Inquiry on the Upper C-band, WISPA acknowledged, "Use of the 4.0-4.2 GHz portion of the band can be authorized for fixed use by automated frequency coordination ("AFC") techniques and power limits that protect in-band earth stations and

[4] *See* Comments of the Dynamic Spectrum Alliance, GN Docket No. 18-122 (filed Jul 3, 2019), at p. 19.
[5] *See* Comments of Monisha Ghosh at p. 2.
[6] See Comments of Comsearch, GN Docket No. 25-59 (filed Jan. 20, 2026), (Comments of Comsearch).

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adjacent-band radio altimeters from harmful interference through geographic exclusion and coordination zones."[7]

To maximize efficient use of this critical mid-band spectrum, the DSA encourages the Commission to explore a full range of options to enable shared use of post-transition Upper C-band spectrum. By leveraging proven sharing tools, such as the 6 GHz AFC and CBRS SAS, the Commission can ensure more intensive use of the Upper C-band, preserve flexibility for Upper C-band FSS operations, and safeguard adjacent band services.

Sincerely,

Martha Suarez
President
Dynamic Spectrum Alliance

[7] See Comments of WISPA – The Association for Broadband Without Boundaries, GN Docket No. 25-59, (filed Apr. 29, 2025) at p. 2.