Before the

FEDERAL COMMUNICATIONS COMMISSION

Washington, D.C. 20554

In the Matter of	)	
	)	
Petition for Rulemaking to Allocate Spectrum and Establish Service Rules for a New Communications Service in Portions of the 1675-1695 MHz and 5350-5470 MHz Band	)	RM-12020
	)	
Allocation and Service Rules for the 1675–1680 MHz Band	)	WP Docket No. 19-116

REPLY COMMENTS OF THE DYNAMIC SPECTRUM ALLIANCE

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President

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May 22, 2026

REPLY COMMENTS OF THE DYNAMIC SPECTRUM ALLIANCE

The Dynamic Spectrum Alliance ("DSA")[1] submits these reply comments in response to the Federal Communications Commission ("FCC" or "Commission") Public Notice seeking comment on Qualcomm's petition for rulemaking proposing the allocation of spectrum and the adoption of service rules for a new communications service in portions of the 1675-1695 MHz and 5350-5470 MHz bands.[2]

The DSA supports the Commission's efforts to advance public safety communications and to enable innovative solutions that enhance the effectiveness and resilience of services for public safety users.

The record reflects that public safety stakeholders are pursuing multiple complementary capabilities, such as off-network and device-to-device communications.[3] These capabilities are not limited to Sidelink and may be supported in different ways. Accordingly, the DSA urges the Commission to maintain a technology-neutral approach in this proceeding. Specifically, the

[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/.

[2] *See Office of Engineering and Technology and Wireless Telecommunications Bureau Seek Comment on Qualcomm's Petition for Rulemaking to Allocate Spectrum and Establish Service Rules for a New Communications Service in Portions of the 1675-1695 MHz and 5350-5470 MHz Bands,* Public Notice, DA 26-337, RM-12020, WT Docket No. 19-116 (rel. Apr. 7, 2026). *See generally* Petition for Rulemaking of Qualcomm Incorporated, WT Docket No. 19-116 (filed Feb. 20, 2026) ("Qualcomm Petition"*).*

[3] *See* Comments of Industry Council for Emergency Response Technologies (iCERT), WP Docket No. 07-100 (filed Nov. 29, 2021); Comments of Comments of Public Safety Spectrum Alliance, WP Docket No. 07-100 (filed Nov. 29, 2021).

Commission should consider a broad range of technological solutions beyond Sidelink technology. Limiting consideration to a single technology would risk constraining innovation and foreclosing additional approaches that may also meet diverse operational needs.

Several commenters have encouraged the Commission to issue a Notice of Proposed Rulemaking ("NPRM"). In this regard, the DSA supports NCTA's recommendation that any inquiry into potential new uses of the 5350-5470 MHz band ("U-NII-2B band") should evaluate a full range of options for both commercial and public use.[4] As noted by T-Mobile, although the 5350-5470 MHz band is currently subject to restrictions under Part 15 of the Commission's rules, "rules for that spectrum, as Qualcomm points out, have not been evaluated since 2014."[5] And as noted by NCTA, the Commission has thus far deferred a decision on whether unlicensed use is possible alongside incumbent operations. The Commission now has an opportunity to revisit this framework in light of significant technological advancements.

In particular, the Commission should consider the potential for expanded unlicensed operations in the band. Wi-Fi and other unlicensed technologies have a well-established track record of facilitating efficient spectrum sharing and flexible coexistence with public safety systems and sensitive government operations.[6] Enabling such technologies, subject to appropriate incumbent protection measures, would promote innovation and economic efficiency.

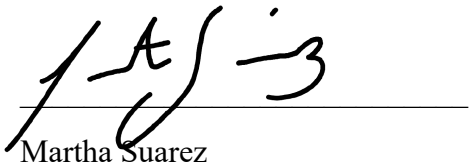
[4] *See* Comments of NCTA.

[5] *See* Comments of T-Mobile USA, Inc.

[6] *See* Comments of NCTA.

At the same time, the DSA recognizes the importance of protecting incumbent and mission-critical operations in and adjacent to the band. Concerns regarding the protection of Synthetic Aperture Radar ("SAR") systems[7], Federal radiolocation operations, and non-Federal Aeronautical Radionavigation Service ("ARNS") systems[8] must be addressed. The Commission should ensure that any new use of the U-NII-2B band incorporates robust technical and operational measures to prevent harmful interference to these incumbent services, as well as to Federal and non-Federal uses in adjacent frequency bands.

Respectfully submitted,



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[7] *See* Comments of Canadian Space Agency.

[8] *See* Comments of Lockheed Martin Corporation.