

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

In the Matter of)
)
Expanding Use of the 12.7-13.25 GHz Band) GN Docket No. 22-352
for Mobile Broadband or Other Expanded use)
)

COMMENTS OF THE DYNAMIC SPECTRUM ALLIANCE

The Dynamic Spectrum Alliance (“DSA”)¹ hereby submits these comments in response to the Federal Communications Commission’s (“FCC” or “the Commission”) Notice of Inquiry (“NOI”) seeking information on the potential for more efficient and intensive use of the 12.7-13.25 GHz Band (“12.7 GHz Band”) and how to broaden its use for terrestrial mobile broadband or other additional services.² The DSA welcomes the opportunity to discuss how the 12.7 GHz

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 *In re Expanding Use of the 12.7-13.25 GHz Band for Mobile Broadband or Other Expanded Use*, Notice of Inquiry and Order, GN Docket No. 22-352, FCC 22-80 (Oct. 27, 2022).

Band offers opportunities for new expanded use while protecting incumbents and avoiding disruption to their operations and encourages the Commission to explore sharing approaches that could promote coexistence in the 12.7 GHz Band through use of automated shared spectrum technology that the Commission is utilizing in other bands, such as the Citizens Broadband Radio Service (“CBRS”) and 6 GHz.

The DSA commends the Commission for its leadership in adopting spectrum sharing frameworks, such as those implemented for TV White Space, CBRS, and 6 GHz, which are leading to the more efficient utilization of spectrum and have fostered innovation and affordable connectivity. Automated frequency coordination 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 that is fast becoming, like electricity, a critical input for other industries and economic activity. Increasing spectrum access by a wide range of new users leads to more rapid deployment of new networks, services, and innovative business models. The DSA believes that the introduction of new licensing options supported by automated dynamic spectrum sharing technology is the best path to support such deployments.

The type of automated shared access system best suited to implement a tiered sharing approach in the 12.7 GHz band depends on the nature of the incumbent usage and the protection criteria the FCC chooses to adopt. Given that the majority of the incumbent users in the 12.7 GHz band are in known, fixed locations, an AFC-like approach may suffice to provide protection

to incumbents. On the other hand, under a tiered licensing approach, a SAS-like automated shared access system could facilitate coordination amongst users of the 12.7 GHz band – both within the incumbent community itself, as well as between and among new lower tier users. In the CBRS band, the SAS provides spectrum assignments to both Tier 2 licensed PALs and to Tier 3 GAA users, ensuring that protection of higher tiers is implemented properly, coordinating PAL channel assignments, minimizing interference amongst GAA users, and maximizing use of available frequencies. This same automated coordination capability could be leveraged for the 12.7 GHz Band to support current and future incumbent operations, while also managing spectrum assignments for a wide variety of secondary users.³ Using the significant experience gained from CBRS, such a framework could allow incumbent operations to continue and to expand on a protected basis, while simultaneously opening the band for a wide range of new users, including Wireless Internet Service Providers (“WISPs”) and a variety of private wireless network operators, to maximize the use of this valuable spectrum.

The DSA appreciates the opportunity to comment on the Commission’s NOI on the future use of the 12.7 GHz Band. We encourage the Commission to extend its sharing models like those used in the CBRS, TV White Spaces and 6 GHz bands to other bands, such as 12.7 GHz. Doing so will ensure efficient utilization of spectrum and foster innovation and affordable connectivity. The DSA and its members stand ready to assist the Commission in bringing the

³ One approach to a tiered sharing approach for the 12.7 GHz Band would be as follows. Tier 1 could consist of primary licensees in the band (including all incumbent users). New fixed and mobile broadband users could access the band on either a lower Tier licensed basis, much like CBRS Priority Access Licensees (“PALs”) do, or on an opportunistic basis in a lower Tier, much like CBRS General Authorized Access (“GAA”) users do today.

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benefits of these sharing frameworks to other bands to support the ongoing needs of innovative use cases.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'M. Suarez', is written over a solid black horizontal line.

Martha SUAREZ
President
Dynamic Spectrum Alliance

December 12, 2022