

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

In the Matter of)	
)	
Spectrum Rules and Policies for the Operation of Unmanned Aircraft Systems)	WT Docket No. 22-323
)	
Petition of AIA for Rulemaking to Adopt Service Rules for Unmanned Aircraft Systems Command and Control in the 5030-5091 MHz Band)	RM-11798 (terminated)
)	

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 Proposed Rulemaking (“NPRM”) seeking comment on its proposed service rules for the 5030-5091 MHz band (“lower 5 GHz band”) to provide Unmanned Aircraft System (“UAS”) operators with access to spectrum to support safety-critical UAS communications links.²

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 the Matter of Spectrum Rules and Policies for the Operation of Unmanned Aircraft Systems; Petition of AIA for Rulemaking to Adopt Service Rules for Unmanned Aircraft Systems Command and Control in the 5030-5091 MHz Band*, Notice of Proposed Rulemaking, WT Docket No. 22-323, FCC 22-101 (released Jan. 4, 2023).

The DSA welcomes the opportunity to discuss how the lower 5 GHz band offers opportunities for new expanded UAS use and how access to the band could be managed by one or more dynamic frequency management systems (“DFMS”). The DSA strongly supports the Commission’s tentative conclusion that use of one or more DFMS for the lower 5 GHz band will have numerous benefits, including:

- Facilitating efficient and intensive use of limited spectrum resources;
- Ensuring reliable access for safety-critical communications links;
- Enabling timely, efficient and cost-effective spectrum access;
- Simplifying compliance with frequency assignments through access controls;
- Protecting in-band and adjacent band operations;
- Supporting opportunistic use in unused portions of spectrum sub-bands designated for exclusive use licenses; and
- Promoting rapid evolution of the use of the band in response to technological, market, and/or or regulatory changes.³

The DSA agrees with the Commission’s assessment that automated shared spectrum technology that the Commission is utilizing in other bands, such as the Citizens Broadband Radio Service (“CBRS”) and 6 GHz, can be leveraged or incorporated in the development and deployment of a DFMS and lead to more efficient utilization of spectrum while protecting users from interference with greater certainty.⁴ We further agree with the Commission’s proposal to

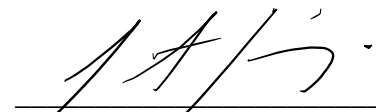
³ NPRM at ¶26.

⁴ Id at ¶27.

permit more than one DFMS to operate in the band, which will provide spur competition, promote innovation, and encourage differentiated services in response to changing market demands.⁵ Moreover, we encourage the FCC to replicate for DFMSs in the lower 5 GHz band the approach it took with CBRS when it established only the minimum high-level requirements necessary to ensure the effective development and operation of the SASs, while leaving other requirements to be addressed by the SAS administrators and multi-stakeholder groups.⁶

Given the extensive experience the Commission has gained with other shared spectrum frameworks and the use of automated shared spectrum technology, the DSA encourages the FCC to adopt its proposal for the use of one or more DFMSs for the lower 5 GHz band. We agree that such an approach is both feasible and practical, and that doing so will ensure efficient utilization of spectrum and foster innovation. The DSA and its members stand ready to assist the Commission in bringing our experience with sharing frameworks to the lower 5 GHz band for UAS operations.

Respectfully submitted,



Martha SUAREZ
President
Dynamic Spectrum Alliance

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⁵ Id at ¶28.

⁶ Id at ¶29.