

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

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In the Matter of

Single Network Future: Supplemental Coverage  
From Space, Space Innovation

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) GN Docket No. 23-65  
) IB Docket No. 22-271  
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**COMMENTS OF CTIA**

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**COMMENTS OF CTIA**

CTIA<sup>1</sup> respectfully submits these comments in response to the Federal Communications Commission’s (“Commission”) Notice of Proposed Rulemaking (“NPRM”) on a proposed framework for authorizing Supplemental Coverage from Space (“SCS”) operations and “incentiviz[ing] creative partnerships between terrestrial network and space station operations” to “close wireless coverage gaps, while retaining high service quality among our nation’s 4G and 5G terrestrial networks, protecting spectrum usage rights, and avoiding harmful interference.”<sup>2</sup> Adopting a practice of case-by-case waivers while ensuring the protection of other affected terrestrial mobile operations will allow the Commission to efficiently resolve the unique circumstances of each SCS proposal and help generate flexible, nuanced decisions that accelerate the deployment of this new technological innovation.

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<sup>1</sup> CTIA —The Wireless Association® (“CTIA”) ([www.ctia.org](http://www.ctia.org)) represents the U.S. wireless communications industry and the companies throughout the mobile ecosystem that enable Americans to lead a 21st century connected life. The association’s members include wireless carriers, device manufacturers, suppliers as well as apps and content companies. CTIA vigorously advocates at all levels of government for policies that foster continued wireless innovation and investment. The association also coordinates the industry’s voluntary best practices, hosts educational events that promote the wireless industry and co-produces the industry’s leading wireless tradeshow. CTIA was founded in 1984 and is based in Washington, D.C.

<sup>2</sup> *Single Network Future: Supplemental Coverage from Space*, Notice of Proposed Rulemaking, GN Docket No. 23-65, IB Docket No. 22-271, FCC-23-22 ¶ 2 (rel. Mar. 17, 2023) (“NPRM”).

## I. INTRODUCTION & SUMMARY

CTIA thanks the Commission for once again taking a leadership role in promoting innovative uses of spectrum to expand access to existing communications services—this time with SCS.<sup>3</sup> As the Commission explains in the NPRM, SCS holds the potential to supplement mobile wireless coverage in remote or unserved areas across the country.<sup>4</sup> As these new technological solutions mature, wireless providers, working in commercial partnership with satellite providers, can leverage the wide-area coverage that satellite stations offer to enhance access to wireless services and to support reliable emergency communications for consumers and first responders in rural, remote, and disaster areas.<sup>5</sup>

CTIA supports the Commission’s proposal to proceed incrementally and protect existing spectrum-use rights by focusing on how best to ensure prompt action for terrestrial licensees who have entered into spectrum lease agreements to supplement their wireless coverage.<sup>6</sup> While SCS technical solutions continue to evolve, CTIA encourages the Commission to use the record developed in this proceeding to establish transparent and predictable guidelines the Commission will use to evaluate any SCS applications brought to its attention, including applications for appropriate waivers. These guidelines, at minimum, should:

1. Limit consideration of SCS applications to those backed by a terrestrial licensee’s voluntary agreement to use its licensed spectrum to supplement its wireless coverage through SCS, as demonstrated by a lease agreement and related Form 608;
2. Make rule waivers for the targeted band or bands available as necessary to support SCS operations, including, but not limited to, waivers of the Table of Frequency Allocations; and

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<sup>3</sup> See NPRM ¶ 1.

<sup>4</sup> *Id.*; see also *id.* ¶ 42.

<sup>5</sup> *Id.* ¶ 1.

<sup>6</sup> *Id.* ¶¶ 46, 52.

3. Require technical and other demonstrations that the proposed satellite signal will not generate harmful interference or disrupt the co-channel and adjacent channel coexistence framework codified in the rules of the target band or bands.

A transparent and predictable set of guidelines for case-by-case evaluation of SCS operations, as opposed to making new mobile satellite service spectrum allocations, will preserve the flexibility the Commission needs to support SCS as it continues to develop while providing sufficient guidance and safeguards needed to prevent harmful interference. This approach will put the Commission in a better position to determine which rules, if any, would need to be amended to accommodate these business opportunities within the existing regulatory framework.

## **II. SCS IS AN EVOLVING MARKET INNOVATION THAT NEEDS FLEXIBILITY TO THRIVE.**

CTIA's members share the Commission's vision for SCS and its goals of advancing SCS capabilities "as rapidly as possible, while minimizing the risk of harmful interference."<sup>7</sup> CTIA members are at the forefront of developing cross-industry partnerships with satellite operators to keep consumers connected, and CTIA members have invested heavily in the spectrum assets needed to provide coverage in unserved and underserved areas.<sup>8</sup> CTIA welcomes the Commission's actions to encourage these creative commercial partnerships, and CTIA encourages the Commission to develop a flexible, yet predictable regulatory pathway, one that relies on existing rules for secondary-market transactions and terrestrial network operators' voluntary agreements to use their licensed spectrum to supplement their wireless coverage through SCS. CTIA also appreciates the Commission's proposal to proceed incrementally and in a way that is

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<sup>7</sup> *Id.* ¶ 42.

<sup>8</sup> *See, e.g., id.* ¶¶ 7-9.