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

In the Matter of	**)**	
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Office of Engineering and Technology	**)**	ET Docket No. 24-121
Seeks Comment on Expanded Federal	)	
Use of the Non-Federal FSS and	)	
MSS Bands	)	

REPLY COMMENTS OF CTIA

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CTIA respectfully submits these reply comments in response to the Public Notice released by the Federal Communications Commission ("FCC" or "Commission") Office of Engineering and Technology ("OET") exploring potentially expanded Federal access to non-Federal satellite services.[1]

I. INTRODUCTION AND SUMMARY.

CTIA supports the Commission's continuing efforts to ensure sufficient spectrum is available for commercial mobile broadband use while facilitating Federal spectrum users' access to the commercial satellite systems that are increasingly necessary to their mission-critical objectives. However, the uncertainty and lack of consensus in the record demonstrate that further progress cannot be made without explicit clarification by the Commission and OET regarding what spectrum bands are being considered for expanded Federal use and, subsequently, thorough consideration and resolution of the issues in each band.

[1] *Office of Engineering and Technology Seeks Comment on Expanded Federal Use of the Non-Federal FSS and MSS Bands*, ET Docket No. 24-121, Public Notice, DA 24-396 (rel. Apr. 26, 2024) ("Public Notice").

As CTIA noted in its initial comments,[2] discrepancies between the Commission's *Notice of Proposed Rulemaking* released in 2013[3] ("*2013 NPRM*") and subsequent *Further Notice of Proposed Rulemaking* in 2021[4] ("*2021 FNPRM*") leave unclear what bands are now under consideration, frustrating the purpose of the process to afford commenters a meaningful opportunity to respond. Moreover, NTIA's comments propose a significantly expanded approach to Federal access that would apply indiscriminately to "any band [where] non-Federal earth stations are allowed to seek protection," without evaluating potential complexity or relevant pending proceedings in any band.[5] NTIA's request also fails to address impacts to bands that are crucial for current or future deployment of innovative 5G services and other terrestrial uses, while upsetting careful balancing between Federal and non-Federal uses and users.

Accordingly, CTIA continues to encourage the Commission and OET to (1) clearly define the spectrum bands not currently allocated for Federal Fixed Satellite Service ("FSS") and Mobile Satellite Service ("MSS") that may be further investigated for expanded Federal use and (2) invite comment on the in-band and adjacent-band technical issues implicated for each identified band. In doing so, the Commission should decline to consider spectrum bands under investigation for commercial mobile use to ensure that critical spectrum is available for the development and deployment of technologies enabling 5G and beyond.

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[2] Comments of CTIA, ET Docket No. 24-121, at 3-5 (filed July 31, 2024) ("CTIA Comments").

[3] *Amendment of Part 2 of the Commission's Rules for Federal Earth Stations Communicating with Non-Federal Fixed Satellite Service Space Stations et al.*, Notice of Proposed Rulemaking and Notice of Inquiry, 28 FCC Rcd 6698 (2013) ("*2013 NPRM*").

[4] *Allocation of Spectrum for Non-Federal Space Launch Operations et al.*, Report and Order and Further Notice of Proposed Rulemaking, 36 FCC Rcd 7764 (2021) ("*2021 FNPRM*").

[5] Comments of NTIA, ET Docket No. 24-121, at 3 (filed July 31, 2024) ("NTIA Comments").

II. THE RECORD REFLECTS UNCERTAINTY REGARDING THE BANDS AND PROCEDURES UNDER CONSIDERATION.

The variety of bands, and associated challenges, addressed in the record reflect uncertainty in the Public Notice proceeding regarding whether the Commission seeks to consider the bands raised in the *2013 NPRM* and *2021 FNPRM*. This uncertainty is underscored by NTIA's comments, which would dramatically alter the scope of this proceeding. In its *2013 NPRM*, the Commission sought comment on NTIA's request for expanded Federal use in 13.275 gigahertz of spectrum,[6] but subsequently pared its request for comment to a subset of those bands—spanning a total of 6.5 gigahertz—in 2021.[7] Rather than reflecting this difference—or the many changes to the spectrum landscape since 2013[8]—NTIA requests access to *all* current and future bands in which there are only non-Federal allocations permitting earth stations using commercial satellite services.[9] To that end, NTIA identifies nearly all of the bands from 2013, as well as five additional FSS bands and four new MSS bands, as candidates for Federal access—a total of 18.365 gigahertz of spectrum and double the number of bands considered by the Commission in 2021.[10] Moreover, it dismisses the resulting imbalance between Federal and

[6] *2013 NPRM*, 28 FCC Rcd at 6703, 6708 ¶¶ 13, 25.

[7] *2021 FNPRM*, 36 FCC Rcd at 7818-19, ¶¶ 149, 151.

[8] *See, e.g.*, *Winning Bidders Announced for Auction of 28 GHz Upper Microwave Flexible Use Service Licenses (Auction 101)*, Public Notice, 34 FCC Rcd 4279 (2019); *Incentive Auction of Upper Microwave Flexible Use Service Licenses in the Upper 37 GHz, 39 GHz, and 47 GHz Bands for Next-Generation Wireless Services Closes*; *Winning Bidders Announced for Auction 103*, Public Notice, 35 FCC Rcd 2015 (2020).

[9] NTIA Comments at 7-8.

[10] *Id.* at 7.

non-Federal spectrum consistently raised by CTIA and others as "mischaracterizing" its request.[11]

These concerns cannot be resolved without action by the Commission and OET to clearly identify the bands under consideration and outline applicable procedures to ensure any Federal access does not burden existing and future uses in the bands. As an initial matter, the Commission and OET should carefully determine which bands are appropriate for consideration, both on their own merits and within the U.S. allocation framework as a whole. For example, commenters agree that not all non-Federal bands should be considered for expanded Federal use.[12] More broadly, Federal migration to utilize commercial satellite systems in the decade-plus since the Commission first initiated its examination of this issue may have rendered some frequencies historically used by Federal agencies available for reallocation for commercial wireless use. Once the specific bands are outlined, CTIA supports a thorough exploration of the merits of each proposed band and the associated domestic and international ramifications of such changes.[13] The potential addition of Federal users to certain spectrum bands—particularly Federal earth stations that require interference protection—would increase the complexity of coordination between terrestrial and satellite users in the bands. As such, the challenges of facilitating expanded Federal access pursuant to the Commission's existing rules, without impeding access by non-Federal licensees, must be resolved on a band-by-band basis.

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[11] *Id.* at 4.

[12] *See*, e.g., Comments of Comsearch, ET Docket No. 24-121, at 1-3 (filed July 31, 2024) ("Comsearch Comments") (reiterating that the 10.7-11.7 GHz band, which the Commission previously recognized is heavily used by terrestrial services, has only become more congested in the last decade and should not be considered.)

[13] *See* Comments of the Satellite Industry Association, ET Docket No. 24-121, at 3-4 (filed July 31, 2024) ("SIA Comments"); Comsearch Comments at 1-3.

Finally, where expanded Federal use may be appropriate, commenters unanimously agree that the Commission must establish clear procedures that require Federal users to comply with Commission rules and avoid introducing new burdens to non-Federal users.[14] The record demonstrates that the Commission must resolve challenges to expanded Federal use arising from incumbent uses in and adjacent to each specific band, the policy issues related to opening each band to primary Federal use, and any pending or anticipated plans for the band. To that end, commenters generally agree that, should the Commission move forward with any of its proposals, Federal applicants should be required to fully comply with the Commission's Part 25 Rules.[15] Likewise, Comsearch asserts that Federal agencies should entirely and exclusively utilize the existing Prior Coordination Notice process applicable for terrestrial systems operating pursuant to Part 74, 78, or 101 of the Commission's rules.[16] However, neither these nor any other band-specific issues are fully addressed, let alone resolved, in the record.[17] Commenters also agree the Commission should explicitly affirm that it retains exclusive jurisdiction, including the sole authority to determine future non-Federal allocations, over any non-Federal spectrum bands considered for expanded Federal use.[18] By addressing these concerns in further proceedings, the Commission can facilitate Federal access to commercial satellite systems without disrupting the existing, carefully balanced, frameworks enabling non-Federal operations.

[14] *See* SIA Comments at 3-5; Comsearch Comments at 3, NTIA Comments at 1, 8-10, CTIA Comments at 5-7.

[15] *See* Comsearch Comments at 3; NTIA Comments at 8-10; SIA Comments at 3.

[16] *See* Comsearch Comments at 3.

[17] *Compare, e.g.*, Comsearch Comments at 3 (explaining that Federal agencies must be subject to the limitations under 47 C.F.R. § 25.136) *with* SIA Comments at 4 (asking the Commission not to include Federal earth stations in the limits set out in 47 C.F.R. § 25.136); *see also infra* at Section III.

[18] *See* NTIA Comments at i; *cf.* SIA Comments at 3-4.

III. ANY EXPANDED FEDERAL USE MUST NOT UNDERMINE CURRENT OR FUTURE COMMERCIAL MOBILE SERVICES.

The Commission should exercise caution to not impede deployment of innovative 5G services and other terrestrial uses of these non-Federal bands into the future. In particular, the 3.7-4.2 GHz ("3.7 GHz") band, 12.7-13.25 GHz ("13 GHz") band, Upper Microwave Flexible Use Service ("UMFUS") bands, and the 2000-2020 MHz and 2180-2200 MHz ("2 GHz") MSS bands should not be considered for expanded Federal use.

A. The 3.7-4.2 GHz and 13 GHz Bands Have Already Been Identified as Crucial Bands for the Spectrum Pipeline.

Any action to expand Federal allocations should reflect ongoing global and domestic efforts to increase access to spectrum for 5G and beyond. The U.S. wireless marketplace continues to spur record levels of investment to build the world's leading 5G networks, resulting in rigorous competition and significant consumer benefits. In 2022 alone, the U.S. wireless industry invested $39 billion to grow, improve, and run their networks, marking the fifth straight year of increased investment and an increase of nearly twelve percent from 2021.[19] These investments have already resulted in technological advancements that benefit consumers, with wireless data traffic in 2022 reaching 73.7 trillion megabytes and nearly 162 million active 5G devices.[20] Despite this, the U.S. spectrum deficit continues to grow. On average, leading countries have made 202 megahertz more mid-band spectrum available for commercial wireless use than the U.S., with this deficit projected to nearly triple by 2027.[21] Relative to consumer

[19] CTIA, 2023 Annual Survey Highlights, at 4 (July 25, 2023), https://api.ctia.org/wp-content/uploads/2023/11/2023-Annual-Survey-Highlights.pdf..

[20] *Id.* at 3, 5.

[21] *See Advancing US Wireless Excellence: The Case for Global Spectrum Harmonization*, ACCENTURE, at 4 (Jan. 2024), https://api.ctia.org/wp-content/uploads/2024/01/Advancing-US-Wireless-Excellence-Global-Harmonization.pdf. ("Accenture 2024 Report").)

demand, the U.S. deficit is even greater, with commercial mobile providers projected to require over 1,400 additional megahertz of licensed, full-power spectrum just to meet demand for data in the U.S. over the next ten years.[22] Ignoring these efforts and adding a primary Federal allocation for the 3.7-4.2 GHz or 13 GHz band would unnecessarily complicate the current incumbent landscape and inhibit the ability of the Commission to consider more flexible uses of these bands in the future.

The 3.4-3.8 GHz band is broadly considered a "5G launch band" and has largely been successfully harmonized globally, where over sixty countries have allocated portions for 5G use.[23] In the U.S., the C-Band transition has been a tremendous success thanks to the substantial actions taken by the Commission, C-Band incumbents, and the Relocation Payment Clearinghouse, alongside the extensive financial commitments made by 3.7 GHz service licensees. As a result, wireless providers began deploying 5G networks on C-Band spectrum roughly six months earlier than the C-Band accelerated Phase II transition deadline,[24] increasing capacity and speeds to the benefit of consumers and businesses nationwide. Moving higher in the frequency range, the European Commission mandated that the European Conference of Postal and Telecommunications Administrations ("CEPT") evaluate the feasibility of using the 3.8-4.2 GHz band for 5G operations, including the development of harmonized technical

[22] *Id.*

[23] *Id.* at 29; ITU, Radio Communication Sector, *World Radiocommunication Conference 2023 (WRC-23) Final Acts*, at Nos. 5.433A, 5.433B, 5.434, 5.434B, 5.435B, https://www.itu.int/hub/publication/r-act-wrc-16-2024.

[24] *See Expanding Flexible Use of the 3.7 to 4.2 GHz Band*, Report and Order and Order of Proposed Modification, 35 FCC Rcd 2343, 2408, ¶ 155 (2020) ("*C-Band Order*").

conditions for use in the region.[25] The band has also been made available for use up to 4.1 GHz in Japan,[26] and other countries have explored opening the band for additional uses.[27]

While NTIA's recent requests for access to the band have focused on the 4.0-4.2 GHz band, this fails to acknowledge ongoing domestic and global trends to evaluate the band for commercial mobile use. The 4.0-4.2 GHz band, which is part of the globally standardized tuning range of 3.3-4.2 GHz, represents a crucial future candidate for harmonized and contiguous use of 5G.[28] As several countries and the European Commission consider additional allocations, the United States has preserved its ability to similarly take further action in the band. To date, the Commission has neither enabled further mobile use of the 3.7-4.2 GHz band in the non-contiguous United States, nor has it lifted the freeze on registering new earth stations for protection in the 4.0-4.2 GHz band of the contiguous United States.[29] Burdening this band with considerations for expanded Federal use would disrupt the Commission's careful balancing and ability to engage in ongoing consideration of the band for potential future mobile use.

Similarly, the National Spectrum Strategy recognizes the Commission's ongoing efforts to enable flexible use services in the 13 GHz band to complement much-needed action to

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[25] European Commission, Mandate to CEPT on technical conditions regarding the shared use of the 3.8-4.2 GHz frequency band for terrestrial wireless broadband systems providing local-area network connectivity in the union (Dec. 16, 2021), https://eccwp.cept.org/WI_Detail.aspx?wiid=804.

[26] *See Japan assigns 5G spectrum to four operators*, EUROPEAN 5G OBSERVATORY (Apr. 16, 2019), https://5gobservatory.eu/japan-assigns-5g-spectrum-to-four-operators.

[27] *See, e.g.*, Australian Communications and Media Authority, Planning of the 3700-4200 MHz Band – Discussion Paper (Aug. 13, 2019), https://www.acma.gov.au/consultations/2019-09/planning-3700-4200-mhz-band-consultation-272019 (Australian 2019 Planning for the 3700-4200 MHz band).

[28] *See* Janett Stewart, Chris Nickerson, & Juliette Welham, *Comparison of Total Mobile Spectrum in Different Markets*, ANALYSYS MASON, at 12 (Sept. 2022), https://api.ctia.org/wp-content/uploads/2022/09/Comparison-of-total-mobile-spectrum-28-09-22.pdf.

[29] *See C-Band Order*, 35 FCC Rcd at 2407-08, ¶ 151.

replenish the spectrum pipeline.[30] As the Commission noted in its proposal to expand the 13 GHz band for mobile broadband use, the band's existing allocations for fixed and mobile use, the light FSS use of the band, and the ability to readily relocate or accommodate incumbent users make it a strong candidate for full-power, exclusive flexible use.[31] The characteristics of the band render it well-suited to support high-speed, low-latency, bandwidth-intensive uses enabled by 5G and 5G Advanced services, especially in densely populated areas, and would complement future mid-band spectrum allocations. As such, the proposed repurposing would provide much-needed support for ever-increasing consumer demand and new, data-intensive applications such as augmented reality and virtual reality, artificial intelligence capabilities, telesurgery, and robotics.

Additionally, the 13 GHz band is allocated globally for fixed and mobile services, making it a suitable candidate for harmonized next-generation wireless operations globally.[32] The Commission's proposed use of the 13 GHz band also positions the United States to take a leading role in global harmonization and shape development of the equipment ecosystem for the band. NTIA's comments do not acknowledge the Commission's assessment and proposed repurposing, current limited use of the band by the FSS, and overwhelming record support for exclusive commercial wireless use of the band. The Commission should decline to consider the 13 GHz for expanded Federal access, as accommodating NTIA's request would frustrate the

[30] *See National Spectrum Strategy*, THE WHITE HOUSE, at 5 (Nov. 13, 2023), https://www.ntia.gov/sites/default/files/publications/national_spectrum_strategy_final.pdf; *Expanding Flexible Use of the 12.2-12.7 GHz Band*; *Expanding Use of the 12.7-13.25 GHz Band for Mobile Broadband or Other Expanded Use*, Report and Order and Further Notice of Proposed Rulemaking and Notice of Proposed Rulemaking and Order, 38 FCC Rcd 5283 (2023) ("*13 GHz NPRM*").

[31] *13 GHz NPRM*, 35 FCC Rcd at 5316, ¶ 58.

[32] *See* Comments of Ericsson, WT Docket No. 20-443, GN Docket No. 22-352, at 4 (filed Aug. 9, 2023); ITU, Radio Regulations, Vol. 1, Article 5 (2020).

Commission's goal to improve the efficient and intensive use of the band without adequate justification.

B. Commercial Wireless Services in Frequencies Allocated for UMFUS Operations Would Be Unduly Burdened by Expanded Federal Access.

CTIA urges the Commission to exclude frequencies with UMFUS allocations from consideration for expanded Federal earth station use, as any Federal access would disrupt the careful balance achieved in these bands. The Commission's Report and Order in the Spectrum Frontiers Proceeding ("*Spectrum Frontiers Order*") clearly prioritized making these bands available for commercial wireless, and the Commission invested years in determining the appropriate amount of protected-status satellite access in these bands.[33] As the Commission explained, it limited co-primary status for FSS operations in the bands because "[u]pgrading the FSS designation to co-primary status, even if limited to individually licensed earth stations, would be inconsistent with terrestrial use of [the bands] and the Commission's decision to facilitate expanded terrestrial use, and would not effectively facilitate sharing in the band[s]."[34] Rather, its balanced approach was "designed to provide FSS licensees with substantial opportunities" to deploy, "while minimizing the impact on terrestrial operations."[35] UMFUS licensees relied on this established sharing framework when making significant commitments to acquire access to the spectrum at auction and investments to deploy in the bands.

Should the Commission nevertheless consider expanded use by Federal earth stations in UMFUS-allocated spectrum, these earth stations must comply with Section 25.136 of the

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[33] *See Use of Spectrum Bands Above 24 GHz for Mobile Radio Services et. al*, Report and Order and Further Notice of Proposed Rulemaking, 31 FCC Rcd 8014 (2016) ("*Spectrum Frontiers Order*").

[34] *Id.*, 31 FCC Rcd at 8034-35, ¶ 50.

[35] *Id.*, 31 FCC Rcd at 8036, ¶ 55; *see also id.*, 31 FCC Rcd at 8044, 8048, 8057-58, ¶¶ 76, 89, 105.

Commission's Rules.[36] CTIA also disagrees with SIA's repeated suggestion from its 2021 comments that Federal earth stations should not be counted against the limit for earth stations in frequencies where Section 25.136 applies.[37] Such an approach would be inconsistent with NTIA's request and SIA's own overarching position, which are premised on parity between Federal and non-Federal users on both uses and terms. Indeed, NTIA clearly requests that Federal users be eligible to use "the same process and operat[e] under the same rules" as commercial earth stations.[38] In every other respect, SIA insists that "any such earth stations would be required to comply with Part 25 of the Commission's rules" and "Federal users should be required to comply with the same technical, regulatory, and procedural rules that govern Non-Federal earth stations."[39] Such a carveout would ensure Federal and non-Federal earth station operators are not treated equally by securing special treatment for non-Federal operators and subject Federal earth stations to unprotected status. SIA also fails to address the impact of its proposal on protection of terrestrial operations, which the rule is designed to ensure. For example, a proliferation of secondary Federal earth stations deployed in UMFUS spectrum could nonetheless disrupt the interference environment for terrestrial operations should Federal stations later require protected status, for example, on the basis of national security.

Section 25.136 of the Commission's rules was carefully crafted to enable additional FSS earth station siting within the UMFUS bands but maintained stringent limits to allow some flexibility to satellite interests without unduly impeding 5G deployment. Indeed, as the Commission explained, the rule was carefully balanced on the premise that "satellite use can be

[36] *See* Comsearch Comments at 3.

[37] *See* SIA Comments at 4.

[38] *See* NTIA Comments at 4-5.

[39] *See* SIA Comments at 3.

accommodated with minimal impact on terrestrial service."[40] Critically, in the 27.5-28.35 GHz band, the rules require that no more than three FSS earth stations per county may obtain protected status.[41] In the 37.5-40 GHz band, up to fifteen earth stations may obtain protected status per partial economic area, but with no more than three earth station locations per county.[42] In both cases, the Commission's goal was to develop rules that would not "impair the growth prospects for mmW mobile."[43] The Commission's reasoning applies equally to any earth station, regardless of whether its operator is a Federal or non-Federal user. Therefore, at minimum, it should continue to apply Section 25.136 to the UMFUS bands, regardless of whether an earth station is Federal or non-Federal.

If anything, SIA's request for special treatment of non-Federal earth station operators confirms that UMFUS bands should be excluded from consideration for expanded Federal access. SIA's proposal risks subjecting mobile operations to harmful interference in the name of maintaining the status quo for non-Federal earth station operators. Moreover, SIA's proposal would effectively make Federal earth stations secondary in all UMFUS allocations, yielding no benefit to Federal users.

C. Expanded Federal Access to the 2 GHz MSS Frequencies Would Conflict with Commission Precedent.

The Commission should not introduce Federal earth stations in the 2 GHz MSS frequencies, consistent with its recent decision and current use of the bands. The Commission

[40] *Spectrum Frontiers Order*, 31 FCC Rcd at 8045, ¶ 76.

[41] *Id.*, 31 FCC Rcd at 8036, ¶ 54; 47 C.F.R. § 25.136(a)(4)(i).

[42] *See Use of Spectrum Bands Above 24 GHz for Mobile Radio Services et al.*, Second Report and Order, Second Further Notice of Proposed Rulemaking, Order on Reconsideration, and Memorandum Opinion and Order, 32 FCC Rcd 10988, 11034, ¶ 137 (2017); 47 C.F.R. § 25.136(c)(1).

[43] *Spectrum Frontiers Order*, 31 FCC Rcd at 8049, ¶ 91.

dismissed recent non-Federal applications in the 2 GHz MSS frequencies, explaining that the frequencies are not available for additional MSS applications.[44] These frequencies are operated by a single MSS operator with auxiliary terrestrial stations within their network such that adding Federal MSS earth stations is infeasible. As the Commission explained, the proper proceeding to evaluate additional MSS applications would be a new rulemaking to identify and evaluate any changed circumstances and determine if additional MSS systems should be authorized for operations in these bands.[45] In response, SpaceX submitted a petition for rulemaking in the 2 GHz band, and that proceeding remains ongoing.[46] NTIA's request for access to the 2 GHz bands does not acknowledge the current infeasibility of additional operations in the band, respond to the Commission's reasoning in dismissing the SpaceX application, or attempt to accommodate the open proceeding. Far from having "little or no impact on other users"[47] or ensuring greater parity between Federal and non-Federal earth station applicants, considering expanded Federal access in the 2 GHz MSS bands would necessarily either be futile or entail fundamental incursion into the rights of the current licensee—while undermining an active Commission rulemaking over matters within its jurisdiction. CTIA believes these reasons provide ample grounds for the Commission to exclude MSS bands from consideration for expanded Federal use but, at minimum, urges the Commission to postpone any such consideration.

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[44] *See Space Exploration Holdings, LLC*; *Application for Modification of Authorization for the SpaceX Gen2 NGSO Satellite System to Add a Mobile-Satellite Service System*, ICFS File No. SAT-MOD-20230207-00022, Call Sign S3069, Order, DA 24-300, ¶ 1 (rel. Mar. 26, 2024).

[45] *Id.* at ¶ 12.

[46] *Request for Comment on Petition for Rulemaking by Space Exploration Holdings, LLC, Regarding Revision of the Commission's 2 GHz MSS Sharing Plan*, RM-11976, Public Notice, DA 24-299 (rel. Mar. 26, 2024).

[47] *See* NTIA Comments at i.

IV. CONCLUSION.

As demonstrated by the ongoing uncertainty and disagreement in the record, the Commission and OET must clearly identify the bands under consideration for expanded Federal use of non-Federal satellite spectrum bands. Certain bands, including those identified above, should be excluded from consideration due to changes to the spectrum landscape, ongoing proceedings impacting some of the bands, and potential future flexible terrestrial use of the spectrum. In addition, the Commission should examine whether the use of commercial satellite systems by Federal agencies has rendered any frequencies previously used by these entities suitable for reallocation for commercial wireless use. Once it publicly identifies the bands under consideration, the Commission should carefully evaluate the merits of each proposed band—including in-band and adjacent-band technical issues and the associated domestic and international impacts of such use—and, accordingly, outline applicable procedures to ensure any Federal access does not burden existing and future non-Federal operations. By adopting a thorough approach, the Commission will ensure expanded Federal use avoids adding unnecessary complexity to the existing interference environment or hindering deployment of innovative terrestrial services, including 5G and beyond.

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