

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20554**

In the Matter of )  
 )  
Promoting Investment in the 3550-3700 MHz ) GN Docket No. 17-258  
Band )  
 )

**COMMENTS OF THE  
NATIONAL TELECOMMUNICATIONS AND INFORMATION ADMINISTRATION**

The National Telecommunications and Information Administration (NTIA)<sup>1</sup> respectfully submits these comments on behalf of the Executive Branch in response to the Notice of Proposed Rulemaking (NPRM) in this proceeding regarding the Citizens Broadband Radio Service (CBRS).<sup>2</sup> Specifically, NTIA wishes to submit into the Commission’s record the attached NTIA Technical Report, *An Analysis of Aggregate CBRS SAS Data from April 2021 to July 2024*.<sup>3</sup> This report builds upon similar work from 2023<sup>4</sup> and reveals continued growth in the deployment of Citizens Broadband Radio Service Devices (CBSDs).

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<sup>1</sup> NTIA is the Executive Branch agency principally responsible for the development of communications policies pertaining to the Nation’s economic and technological advancement and to the regulation of the communications industry, for the coordination of the communications activities of the Executive Branch, and for the effective presentation of the views of the Executive Branch to the Commission. See 47 U.S.C. § 902(b)(2).

<sup>2</sup> *Promoting Investment in the 3550-3700 MHz Band*, Notice of Proposed Rulemaking, GN Docket No. 17-258, FCC 24-86 (rel. Aug. 16, 2024).

<sup>3</sup> D. Boulware, A. Romaniello, *An Analysis of Aggregate CBRS SAS Data from April 2021 to July 2024*, NTIA Report 25-575, U.S. Department of Commerce, National Telecommunications and Information Administration, Institute for Telecommunication Sciences (Nov. 2024) (NTIA Technical Report).

<sup>4</sup> D. Boulware, A. Romaniello, R. Dorch, and M. Cotton, *An Analysis of Aggregate CBRS SAS Data from April 2021 to January 2023*, Technical Report TR-23-567, U.S. Department of Commerce, National Telecommunications and Information Administration, Institute for Telecommunication Sciences (May 2023).

With CBRS, the Commission established a ground-breaking spectrum-sharing paradigm that has enabled commercial access to mid-band spectrum and has evolved to demonstrate the success of a collaborative partnership among stakeholders in the public and private sectors. CBRS relies on Dynamic Protection Areas (DPAs) around which commercial entrants and protected incumbents can dynamically share spectrum by means of automated Spectrum Access Systems (SASs). The NTIA Technical Report – prepared by NTIA’s Institute for Telecommunications Sciences (ITS) – shows that CBRS continues to successfully facilitate growth in wireless broadband devices and provide cost-effective wireless broadband access, especially in rural communities. ITS obtained operational data from the SAS administrators, and this report provides an updated presentation and analysis from April 1, 2021, through July 1, 2024. With the next such report, based upon data captured after July 1, 2024, usage will reflect operations under so-called “CBRS 2.0” – benefiting from a number of improvements, including reduced protection areas.<sup>5</sup>

This NTIA Technical Report has a number of important findings, including:

- CBRS deployments have grown significantly, with an increase of 270,621 from April 1, 2021 to July 1, 2024. Annual increases in 2022 and 2023 were 95,692 and 78,058, respectively.
- Rural CBSDs have more than doubled, with an increase of 166,650 (160.6%), and as of July 1, 2024, 67.5% of all CBSDs were in rural census blocks.<sup>6</sup>
- In 2023, for new CBSD deployments, there were more in DPA-impacted counties (46,583) than in non-impacted counties (31,482).

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<sup>5</sup> See Letter from C. Cooper, NTIA Assoc. Administrator, to R. Repasi, FCC, OET Chief (June 11, 2024), <https://www.fcc.gov/ecfs/document/1061155768162/1>; *Wireless Telecommunications Bureau and Office of Engineering and Technology Approve Certified SAS Administrators to Use Modified Aggregate Interference Model*, Public Notice, DA 24-643, GN Docket Nos. 17-258 and 15-319 (rel. Jul. 3, 2024), <https://www.fcc.gov/document/sass-approved-use-modified-aggregate-interference-model>.

<sup>6</sup> Rural CBSDs are those not located in a Census Bureau-designated urban area. See NTIA Technical Report at 8.

- 5G New Radio CBSD deployments increased to 11.9% of active CBSDs as of July 1, 2024.
- CBSDs that only use General Authorized Access (GAA) grants accounted for 57.6% of the increase in CBSDs; as of July 1, 2024, 71.4% of the CBSDs were GAA-only and 94.9% of all CBSDs had GAA grants.
- Since July 1, 2021, the number of CBSDs with Priority Access License grants increased by 92,544 CBSDs (418%) to a total of 114,682 CBSDs as of July 1, 2024.
- 82.7% of all counties in the United States used at least one channel of CBRS and 41% of all counties used all 15 channels as of July 1, 2024.

NTIA very much appreciates the cooperation and assistance of the SAS administrators and the Commission in the preparation of this report. Without their support, this report would not have been possible.

Respectfully submitted,

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