

10 December 2015

Ms. Paige Atkins
Associate Administrator
Office of Spectrum Management
National Telecommunications and Information Administration
1401 Constitution Ave., NW
Washington, DC 20230

Dear Paige,

The Spectrum Sharing Committee of the Wireless Innovation Forum serves as a common industry and government standards body to support the development and advancement of spectrum sharing technologies for the 3.5 GHz band. This Committee is intended to facilitate the interpretation and implementation of FCC rulemaking to a level that allows industry and government parties to collaborate on implementation of a common, efficient, well functioning ecosystem around this technology.

I currently serve as the chair for the Test and Certification Working Group organized under the Spectrum Sharing Committee. I am writing to make you aware of recent discussions within the Work Group, which may deserve further attention by the National Telecommunications and Information Administration (“NTIA”).

Members of the Working Group have completed an assessment of the exclusion zone distance analysis and the exclusion zones needed to protect the shipborne radars operating in the 3550–3650 MHz band and ground-based radars operating adjacent to the 3550–3650 MHz band as detailed in Appendix B and Appendix C, respectively, of NTIA Report 15-517 (“NTIA Exclusion Zones”)¹. Specifically, the Working Group members note the following:

- 1.) The NTIA Coastal Exclusion Zones do not include states and territories located outside of the Continental United States (OCONUS) such as the coastal regions of Alaska or the islands of Puerto Rico, Hawaii and various other Pacific and Caribbean island territories. Does the NTIA desire to extend and apply geographic exclusion zone protection to the OCONUS regions?
- 2.) The coastal exclusion zone for the Gulf Coast region does not currently include areas in which fixed, offshore communications services, such as for oil exploration, may be operated. Would the NTIA consider adopting the existing geographic zones defined in 47 CFR 74.709(e) for Offshore Radio Service or define a new geographic zone for the Gulf region?

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It would be most useful if the NTIA could provide further information related to the items above. An unambiguous definition of exclusion zones is needed as the industry continues to develop the test and certification standards for Spectrum Access Systems that will enable operation in the 3.5 GHz band.

We look forward to your response.

Sincerely,



Kurt Schaubach
Chair, SSC WG4 Test and Certification

ⁱ 3.5 GHz Exclusion Zone Analyses and Methodology, NTIA Technical Report TR-15-517, June 18, 2015