

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of:	)	
	)	
Allocation of Spectrum for Non-Federal Space	)	ET Docket No. 13-115
Launch Operations	)	
	)	
Revision of Section 87.305(a) of the	)	
Commission's Rules	)	RM-12025
	)	

**COMMENTS OF
THE NATIONAL ASSOCIATION OF BROADCASTERS**

I. INTRODUCTION AND SUMMARY

The National Association of Broadcasters (NAB)¹ submits brief comments in response to the Commission's Public Notice seeking public input on measures to ensure reliable access to spectrum for space launch activities consistent with the goals of the President's National Space Transportation Policy.² The Policy's goal is to support more than 1,000 launches and reentries annually by 2030. NAB also provides comments regarding the Commercial Space Federation (CSF) Petition.

NAB does not oppose non-federal space launch operations in the 2025–2110 MHz band.³ Indeed, to date, NAB has yet to hear of any significant issues relating to frequency coordination between launch operators and broadcasters, and we expect broadcasters will

¹ The National Association of Broadcasters (NAB) is the nonprofit trade association that advocates on behalf of free local radio and television stations and broadcast networks before Congress, the Federal Communications Commission and other federal agencies, and the courts.

² Public Notice, ET Docket 13-115 and RM-12025, DA 26-887 (rel. Aug. 25, 2026).

³ NAB Comments, ET Docket 13-115, at 1 (Aug. 11, 2021).

continue to be willing partners in sharing spectrum with new users. But broadcasters operate in an increasingly constrained environment. Broadcasters must conduct live newsgathering while navigating recent changes to the 6 and 7 GHz bands, anticipating further changes to the 13 GHz BAS band, and facing the loss of C-band satellite capacity even as the Ku-band alternative becomes increasingly constrained.⁴ For broadcasters to continue to conduct uninterrupted live newsgathering operations, meaningful coordination and interference protections must remain in place. Frequency coordination between launch operators and broadcasters must remain a mandatory precursor to access this spectrum for space launch and reentry activities. Federal space launch operations should not impact or constrain primary broadcast auxiliary service (BAS) operations in the 2025–2110 MHz band. And when evaluating new sharing obligations, the Commission should not assume that broadcasters will be able to seek refuge in another band if it removes necessary coordination protections.

The provisions reflected in footnote US94 of 47 C.F.R. § 2.106, which restrict transmissions in 2025–2110 MHz to telecommand use (uplink only) for prelaunch testing and space launch and recovery operations and require that such operations be coordinated with non-federal fixed and mobile stations, provide appropriate protections to broadcasters. The Commission should retain these restrictions on transmissions and coordination requirements.

⁴ See, e.g., *Unlicensed Use of the 6 GHz Band*, ET Docket No. 18-295, Report and Order and Further Notice of Proposed Rulemaking, 35 FCC Rcd 3852 (2020); *Unlicensed Use of the 6 GHz Band*, ET Docket No. 18-295, Second Report and Order, Second Further Notice of Proposed Rulemaking, and Memorandum Opinion and Order on Remand, 38 FCC Rcd 10720 (2023); *Satellite Spectrum Abundance; Expanding Use of the 12.7–13.25 GHz Band for Mobile Broadband or Other Expanded Use*, SB Docket No. 25-180, GN Docket No. 22-352, Further Notice of Proposed Rulemaking and Notice of Proposed Rulemaking, FCC 25-29 (2025); *Upper C-band (3.98–4.2 GHz); Expanding Flexible Use of the 3.7 to 4.2 GHz Band*, GN Docket Nos. 25-59, 18-122, Report and Order, Order of Proposed Modification, and Order on Reconsideration, FCC 26-46 (July 22, 2026); *Modernizing Spectrum Sharing for Satellite Broadband*, Report and Order, FCC 26-26 (May 1, 2026).

The CSF Petition proposes to eliminate an existing frequency coordination mechanism for access to Aeronautical Telemetry spectrum and substitute it with a “licensed light” mechanism.⁵ To the extent that existing coordination mechanisms may have become inefficient or burdensome, the appropriate solution is to improve and streamline those processes. Even still, the CSF Petition fails to provide a detailed roadmap for implementing such a “licensed light” mechanism, and a robust record is needed before any such mechanism can be considered. As in many other bands, frequency coordination is a critical tool for enabling interference-free spectrum sharing among diverse services and any changes to existing requirements and mechanisms must be carefully considered with adequate timelines that consider and accommodate all parties.

II. THE 2025–2110 MHZ BAND IS A CRITICAL PART OF AN INCREASINGLY CONSTRAINED BAS ENVIRONMENT

As the Commission is aware, the 2025–2110 MHz band is the workhorse for broadcast Electronic Newsgathering (ENG) operations, and ENG operations are only becoming increasingly constrained in the BAS environment. It is allocated on a primary basis to the BAS, Cable Radio Relay Service (CARS), and Local Television Transmission Service (LTTS).⁶ BAS represents the predominant non-federal use of the band.⁷ The band supports short-distance links from low-power portable cameras as well as longer-distance links from higher-power “news truck” vehicles. It also is effectively the only spectrum routinely available for airborne ENG because other spectrum and transmission technologies (including commercial mobile

⁵ See Petition for Rulemaking of Commercial Space Federation, RM-12025 (filed August 4, 2026) (CSF Petition).

⁶ *Allocation of Spectrum for Non-Federal Space Launch Operations*, Report and Order and Further Notice of Proposed Rulemaking, ET Docket 13-115, ¶ 43 (rel. Apr. 22, 2021) (FNPRM).

⁷ *Id.*

systems commonly used for “bonded cellular” ENG) are generally prohibited from use while airborne.⁸

Given the nature of ENG operations, preserving uninterrupted access to this band is critical. ENG is a mobile service with many ENG operations being fleeting and involving time-sensitive, real-time coverage of emergencies and other events from unforeseen locations. Section 74.24 of the Commission’s rules expressly permits certain BAS stations to operate short-term without prior FCC authorization⁹ because coordination mechanisms that rely principally on fixed database records cannot adequately protect mobile ENG operations. Interference that disrupts an ENG transmission can result in the permanent loss of news or public-safety information. Unlike many other communications, there typically is no second chance to repeat the transmission.

The importance of preserving reliable access to this band has increased as other components of the BAS ecosystem have come under growing pressure. In portions of the 6 and 7 GHz bands used for mobile BAS, broadcasters now operate alongside increasingly ubiquitous unlicensed devices. The 13 GHz BAS band is shared with fixed and satellite services and is the subject of proposals for expanded non-broadcast use. Broadcasters also face a narrowing set of satellite alternatives. The Commission’s Upper C-band proceeding is effectively shifting satellite newsgathering and other broadcast traffic that has historically relied on C-band capacity toward Ku-band, concentrating more broadcast demand there. At the same time, the Commission has revised its satellite spectrum sharing rules to permit

⁸ See, e.g., 47 C.F.R. § 22.925.

⁹ 47 C.F.R. § 74.24 (“... broadcast auxiliary stations ... may be operated on a short-term basis under the authority conveyed by a part 73 license or a broadcast auxiliary license without prior authorization from the FCC ...”).

substantially more intensive NGSO use of Ku-band spectrum. Thus, even as broadcasters become increasingly dependent on Ku-band as an alternative to C-band, the sharing environment in Ku-band is becoming more complex and uncertain.

Further, the CSF petition to eliminate the requirement to coordinate with non-federal AMT operations through a frequency advisory committee (*i.e.*, AFTRCC) is concerning because details of an envisioned “licensed light” replacement and a timeline for its implementation are not adequately described. Despite occasional hiccups,¹⁰ broadcasters make extensive, albeit secondary, use of L-band Aeronautical Telemetry spectrum (1435–1525 MHz) on a non-interference basis through the existing frequency coordination mechanism. Considerable investment has been made by equipment manufacturers and BAS operators to implement an automated coordination process with “eKey” control over the transmitting equipment. A sudden change in that mechanism risks interruption or elimination of BAS access to this spectrum and loss of that investment. Taken together, these developments leave broadcasters with a declining number of alternatives when spectrum is unavailable or interference occurs.

The 2025–2110 MHz band is also already the subject of substantial spectrum-sharing efforts involving federal users. NAB and the Society of Broadcast Engineers (SBE) have worked extensively with the Department of War (DOW) to coordinate and accommodate co-primary military operations in the band.¹¹ The Commission directed DOW, NAB, and SBE to develop a Memorandum of Understanding (MOU) to govern spectrum sharing in this band. That process has required extensive field and laboratory testing and the development of

¹⁰ CSF Petition at 17.

¹¹ FNPRM ¶ 45.

detailed coordination requirements and procedures intended to permit BAS and DOW systems to operate without harmful interference. Significant federal resources have also been devoted to modifying and updating DOW systems for operation in this band in anticipation of shared use under the MOU.

The introduction of additional, inadequately coordinated space launch and recovery operations could complicate that sharing environment and potentially undermine the arrangements developed among broadcasters and DOW. The band is already supporting multiple dynamic and critical services, leaving little margin for accommodating additional operations that are not carefully bounded and coordinated. Coordinated launch operations from a limited number of designated sites can likely continue to be accommodated along with BAS and DOW operations, but any significant expansion in the number or geographic distribution of launch or uplink sites must be carefully coordinated to avoid adverse effects on either BAS or federal operations. This sharing environment exists in addition to satellite-related operations conducted by DOW, NASA, and NOAA.¹²

III. EXPANDED USE OF 2025–2110 MHZ SHOULD REMAIN LIMITED TO LAUNCH-RELATED OPERATIONS

Unlike transmissions for launch operations near established launch sites, on many occasions, broadcasters have experienced interference from uplink facilities in the 2025–2110 MHz band supporting other space-related activities, including those involving in-orbit satellites and/or their payloads.¹³ That experience illustrates the distinction between the

¹² See, e.g., 47 C.F.R. § 2.106, nn. US222, US346, and US347.

¹³ Known incidents include interference from a government uplink in the Houston area, interference from commercial uplinks doing pre-launch testing in the Los Angeles area, interference from federal uplinks doing testing in the San Francisco area, and interference from unknown sources in the San Diego area suspected to involve ground testing of equipment for federal satellite programs.

carefully bounded launch operations that NAB supports and a broader allocation for space-related communications. Coordination remains manageable when transmissions are associated with *bona fide* launches, originate from a relatively limited universe of locations, and occur for defined periods. Coordination becomes substantially more difficult as those constraints are relaxed.

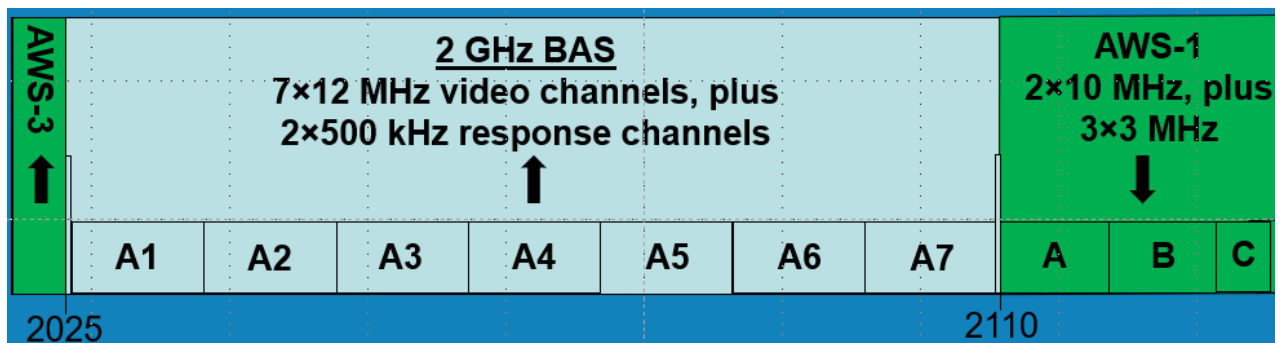
For that reason, the allocation should not be expanded to encompass routine on-orbit communications with satellites or payloads, space-to-space links except as otherwise expressly authorized, or other operations unrelated to the launch and recovery of a launch vehicle. Maintaining this limitation is particularly important because conventional frequency-coordination approaches do not adequately identify or protect ENG operations. Commercial frequency coordination firms may be well equipped to analyze interference involving fixed facilities, but static database analyses frequently fail to identify potentially affected ENG operations or to ensure coordination with the broadcasters operating in a particular market. As previously discussed, ENG facilities are inherently mobile and, in many cases, are not represented by site-specific database entries.¹⁴ Direct coordination with broadcasters thus must always occur, and such coordination will remain practicable only if the number of uplink locations is limited and use of the band remains confined to launch-related operations.

¹⁴ For example, the “Frequency Coordination and Interference Analysis Report” for Universal Space Network, prepared by Comsearch identifies outreach to BAS licensees that are no longer in existence. It is therefore unclear whether current broadcast licensees were contacted. See Comsearch, Frequency Coordination and Interference Analysis Report for Universal Space Network (May 1, 2020).

IV. NARROWBAND SPACE LAUNCH OPERATIONS SHOULD USE THE 2025–2025.5 AND 2109.5–2110 MHz SEGMENTS TO THE EXTENT PRACTICABLE

Concentrating narrowband launch operations in upper- and lower-data return link (DRL) segments — at 2025–2025.5 MHz and at 2109.5–2110 MHz — would simplify coordination over relatively large geographic areas while minimizing disruption to routine BAS operations. Broadcaster use of the 2025–2110 MHz band is channelized into seven 12 MHz channels as shown in Figure 1.¹⁵ As a result, there are two 500 kHz segments, at 2025–2025.5 MHz and 2109.5–2110 MHz, that are designated as upper- and lower-DRL “response channels” but are not routinely used.¹⁶ NAB’s review of commercial space launch authorizations suggests that many launch telecommand systems occupy less than 500 kHz of bandwidth. These two 500 kHz band segments therefore may provide a particularly suitable “home” for narrowband launch operations and could serve as preferred frequencies when technically feasible.

Figure 1 : 2 GHz BAS Channel Designations



If narrowband launch operations were concentrated in these DRL segments, it would simplify coordination over relatively large geographic areas. It also would minimize disruption to routine BAS operations. NAB therefore recommends that launch operators employing

¹⁵ 47 C.F.R. § 74.602(a)(3)(i).

¹⁶ 47 C.F.R. § 74.602(a)(3)(ii).

bandwidths of 500 kHz or less be directed, or at a minimum strongly encouraged, to use the 2025- 2025.5 MHz and 2109.5–2110 MHz segments whenever technically practicable.

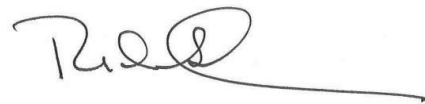
V. CONCLUSION

Broadcasters have demonstrated that they can accommodate space launch operations in the 2025–2110 MHz band as long as those operations are appropriately limited and coordinated. The Commission should preserve that successful framework as it seeks to support the nation’s growing commercial space industry. Indeed, as the environment for BAS becomes increasingly congested, the need for careful spectrum management becomes even more critical. New users should be accommodated where they can operate efficiently and predictably while minimizing their impact on incumbent operations and preserving broadcasters’ ability to respond to breaking news and emergencies. The Commission should continue to apply those principles here, recognizing that successful spectrum sharing depends not simply on finding room for each new entrant but on preserving a workable spectrum environment for all users over time.

Respectfully submitted,

**NATIONAL ASSOCIATION OF
BROADCASTERS**

1 M Street, SE
Washington, DC 20003
(202) 429-5430

A handwritten signature in dark ink, appearing to read "Rick Kaplan", with a long horizontal line extending to the right.

Rick Kaplan
Nandu Machiraju
Alison Martin
Robert Weller

September 14, 2026