

**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
	)	

**REPLY COMMENTS OF
THE NATIONAL ASSOCIATION OF BROADCASTERS**

I. INTRODUCTION AND SUMMARY

The National Association of Broadcasters (NAB)¹ submits these reply comments for the Commission's Public Notice seeking input on measures to ensure reliable spectrum access for space launch and reentry activities and the Petition for Rulemaking filed by the Commercial Space Federation (CSF).² As NAB explained in its initial comments³ broadcasters support the continued growth of the nation's commercial space industry and have successfully accommodated space launch operations in the 2025–2110 MHz band. That success has depended on meaningful frequency coordination and appropriate protection of

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 No. 13-115, at 1 (Sep. 14, 2026).

incumbent operations, and the record in this proceeding continues to support those requirements.

Many comments submitted in this proceeding, however, expressly reject the premise that shortcomings in an existing coordination process justify eliminating those coordination mechanisms altogether. Commenters representing aviation manufacturers, aerospace and defense companies, advanced air mobility developers, professional wireless microphone users, medical users, technology and space-industry interests, and spectrum-management professionals all demonstrate that these concerns are hardly unique to broadcasters.⁴

This broad cross-industry record should guide the Commission as it considers both the CSF Petition and potential changes to spectrum access for space launch activities. The Commission need not choose between supporting the commercial space industry and protecting existing spectrum users. Instead, the record broadly supports a course to improve coordination where necessary, while preserving the fundamental spectrum-management principles that have allowed diverse services to successfully share increasingly congested spectrum.

NAB believes that the record in this proceeding supports three principles:

- Existing allocation priorities and interference protections must remain the foundation for expanded spectrum sharing;

⁴ See, e.g., Comments of the Aerospace Industries Association, ET Docket No. 13-115, at 1 (Sept. 14, 2026); Comments of the General Aviation Manufacturers Association, ET Docket No. 13-115, at 3 (Sept. 14, 2026); Comments of Joby Aviation, Inc., ET Docket No. 13-115, at 3 (Sept. 14, 2026); Comments of Lockheed Martin Corporation, ET Docket No. 13-115, at 6 (Sept. 14, 2026); Comments of Chad Stone, ET Docket No. 13-115 (Sept. 10, 2026); Comments of the Wireless Microphone Spectrum Alliance, ET Docket No. 13-115 (Sept. 14, 2026); Comments of the Enterprise Wireless Alliance, ET Docket No. 13-115, at 2 (Sept. 14, 2026); Comments of CP Communications, ET Docket No. 13-115, at 2 (Sept. 14, 2026); Comments of Engineers for the Integrity of Broadcast Auxiliary Services Spectrum, ET Docket No. 13-115 (Sept. 14, 2026); Comments of ITI Space Enterprise Council, ET Docket No. 13-115 (Sept. 14, 2026).

- Coordination processes should be improved and streamlined while retaining long-standing, professional coordination methods where necessary; and
- While automation and database tools can be used to make coordination more efficient, technically informed direct coordination must be preserved for mobile and dynamic operations that cannot reliably be captured in a database.

Those principles are especially important in the 2025–2110 MHz band, which broadcasters depend on for unpredictable and time-sensitive electronic newsgathering (ENG) operations.

II. THERE IS BROAD SUPPORT FOR PRESERVING MEANINGFUL COORDINATION AND INCUMBENT PROTECTIONS

A. Commenters Across Multiple Industries Agree That Coordination Should Be Improved, Not Eliminated

In initial comments, NAB explained that, to the extent existing coordination mechanisms may have become inefficient or burdensome, the appropriate response is to improve and streamline those mechanisms, not to eliminate coordination.⁵ Frequency coordination remains a critical tool for enabling interference-free spectrum sharing among diverse services, and substantial changes to existing coordination mechanisms should occur only after development of a robust technical record. That position finds substantial support from commenters with interests extending well beyond broadcasting.

The aviation industry generally agrees with NAB that claimed shortcomings in the existing process do not justify eliminating the existing coordination framework and urges targeted procedural improvements instead.⁶ They state that the existing framework is not broken, but has, in fact, evolved to accommodate launch operations, and additional

⁵ NAB Comments at 3.

⁶ See, e.g., Comments of the Aerospace Industries Association, ET Docket 13-115, at 1 (Sep. 14, 2026); Comments of Joby Aviation, Inc., ET Docket 13-115, at 3 (Sep. 14, 2026). (Joby Aviation Comments); Comments of The Boeing Company, ET Docket 13-115, at 4 (Sep. 14, 2026).

efficiencies can be achieved without eliminating protections for incumbent users.⁷ The General Aviation Manufacturers Association (GAMA) goes furthest in this regard, asking the Commission to set aside the CSF Petition.⁸ GAMA instead identifies means of improving the existing coordination regime to accommodate additional secondary uses.⁹ NAB agrees. These comments are particularly significant because they come from entities and industries that have their own substantial interest in U.S. leadership in aviation, aerospace, and space transportation.

The record, therefore, does not present a simple contest between commercial space operators seeking innovation and incumbents seeking preservation of the *status quo*. Rather, it demonstrates broad inter-industry recognition that increasing launch cadence makes effective spectrum coordination more important.

B. Allocation Priorities Must Be Preserved

There is similarly broad agreement in the record that any modernization of coordination procedures must not undermine the Commission's existing spectrum allocation framework. As Joby Aviation succinctly states: "coordination procedures should facilitate coexistence [but] should not indirectly change allocation priorities or allow a secondary use to constrain an incumbent primary use."¹⁰

Other commenters agree that there should be no reduction in incumbent interference protections or any change in the existing allocation priorities that would undermine the

⁷ *Id.*

⁸ Comments of the General Aviation Manufacturers Association, at 3 (Sep. 14, 2026).

⁹ *Id.*

¹⁰ Joby Aviation Comments at 5.

spectrum rights of primary users.¹¹ As NAB previously explained, if space launch and recovery operations require greater spectrum rights or protection than their existing allocations provide, then the Commission should address that question directly through a robust, technically informed proceeding involving all affected stakeholders.¹²

Preservation of allocation priorities is particularly relevant to the 2025–2110 MHz band, where the Broadcast Auxiliary Service (BAS, of which ENG is a part) is a primary service. While the Commission recently made that same spectrum available for commercial space launch operations on a secondary basis, protection of primary services depends on coordination mechanisms that respect the allocation structure rather than becoming a means of changing it indirectly. As NAB explained in its initial comments, federal and non-federal launch operations should not constrain primary BAS operations in the 2025–2110 MHz band.¹³ Accordingly, the Commission should retain the existing restrictions and coordination protections reflected in footnote US94¹⁴ and ensure that any changes to the space launch frequency coordination framework remain consistent with broadcasters’ and others’ primary status.

C. Coordination Mechanisms Must Account for Dynamic Operations

The record in this proceeding demonstrates that no single coordination mechanism is appropriate for every type of spectrum use. Several commenters point out that coordination models developed for fixed operations in other bands, such as the 70/80/90 GHz registration

¹¹ See, e.g., Comments of the National Taxpayers Union, ET Docket 13-115, at 1 (Sep. 14, 2026); Comments of Lockheed Martin Corporation, ET Docket 13-115, at 6 (Sep. 14, 2026).

¹² NAB Comments at 3.

¹³ NAB Comments at 2.

¹⁴ 47 C.F.R. § 2.106 nn. US94.

approach, do not translate to situations involving highly dynamic mobile operations.¹⁵

Coordination models that rely on a static database are not an adequate substitute for technically informed coordination of mobile systems, including ENG and AMT transmitters, which may operate intermittently and over large and changing geographic areas. In the case of ENG, databases simply do not identify where or when a transmitter will operate or which broadcaster must be contacted to prevent interference. Thus, the CSF proposal to rely on a “licensed light” or database-oriented coordination model cannot adequately address the full range of operations that must be considered in coordinating shared spectrum. A database may be a useful **tool used in coordination**, but it is no substitute for coordination itself.

The Commission should follow the same principle here. Automation can improve efficiency, but where potentially affected operations are dynamic or cannot reliably be captured in a database, those tools cannot substitute for technically informed coordination between affected users. In the case of protecting primary operations, direct coordination must remain mandatory.

III. COORDINATION MUST ACCOUNT FOR THE OPERATIONAL NEEDS OF ALL SPECTRUM USERS

Effective spectrum sharing requires coordination mechanisms that account for the operational characteristics of all affected services, including services that may be mobile, operate on short notice, or are safety-related. Production-oriented service providers report that technically informed coordination has successfully enabled intensive use of shared spectrum by operators whose locations, equipment configurations, and spectrum requirements vary substantially from event to event.¹⁶ That experience demonstrates that

¹⁵ See, e.g., Joby Aviation Comments, at 3.

¹⁶ Comments of CP Communications, ET Docket 13-115 at 2 (Sep. 14, 2026).

effective coordination can accommodate many spectrum uses while providing the predictability affected users need to plan their operations.

The practical question is not merely whether interference occurs during a launch event, but whether other spectrum users can reliably plan major events weeks or months in advance. Launches are often delayed, scrubbed, or rescheduled, but the Super Bowl will almost certainly occur at its scheduled date and time. Similarly, Medical Body Area Networks (MBANs) and AMT operations both represent potential safety-of-life concerns that cannot be expected to simply work around launch schedules.¹⁷ Licensed wireless microphone users similarly rely on predictable spectrum availability to plan and conduct events.¹⁸ A successful coordination framework therefore must provide launch operators with reliable spectrum access while preserving the ability of other users to plan and conduct their operations with comparable confidence.

IV. CONCLUSION

The record demonstrates substantial common ground across industries with very different spectrum needs. Supporting the continued growth of the U.S. commercial space industry does not require abandoning the coordination principles that have enabled diverse services including broadcasters, aviation manufacturers, aerospace and defense companies, advanced aviation developers, professional production users, medical-spectrum interests, technology interests, and spectrum-management professionals to successfully share spectrum. To the contrary, increasing demands on shared spectrum make effective coordination even more important.

¹⁷ Comments of the Enterprise Wireless Alliance, ET Docket 13-115 at 2 (Sep. 14, 2026).

¹⁸ Comments of Chad Stone, ET Docket 13-115 (Sep. 10, 2026).

The Commission should build on what works. It should preserve existing allocation priorities and interference protections while improving coordination processes where appropriate and ensuring those processes account for the operational characteristics of all affected users. For the 2025–2110 MHz band, that means preserving US94’s existing operational limitations and coordination requirements, protecting primary BAS operations through direct coordination with broadcasters where necessary, and continuing to accommodate appropriately bounded and coordinated launch operations. This approach will support reliable spectrum access for commercial space operations while preserving a predictable and workable spectrum environment for all users.

Respectfully submitted,

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

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September 24, 2026