June 29, 2018

VIA ELECTRONIC FILING

Mr. Anthony Serafini
Chief, Experimental Licensing Branch
Office of Engineering and Technology
Federal Communications Commission
445 Twelfth Street, SW
Washington, DC 20554

Re: STA Applications 0783-EX-ST-2018 and 0843-EX-ST-2018

Dear Mr. Serafini,

CTIA respectfully offers the following informal comments in response to two applications filed by SRI International ("SRI") seeking experimental special temporary authority ("STA") for radar operations in, *inter alia*, the 2.93625-3.5 GHz band.[1]

In the applications, SRI proposes to use the STAs to "test an experimental S-band radar system on a high altitude balloon" at altitudes between 5,000 and 60,000 feet. It indicates that STA "is necessary to operate the radar while the balloon is airborne" and is required "for the balloon-ground two-way communication link needed to control the radar and downlink data while the balloon is airborne."

The frequencies at issue in the SRI applications are currently allocated, *inter alia*, for the federal radiolocation service on a primary basis, and the non-federal radiolocation service on a secondary basis. In particular, the proposed frequencies include 50 megahertz of the 3450-3550 MHz band that the National Telecommunications and Information Administration ("NTIA") has identified to study for potential repurposing for commercial wireless services.[2] In the 3450-3500 MHz portion of the band

[1] *See* Application of SRI International, 0783-EX-ST-2018 (filed May 3, 2018); Application of SRI International, 0843-EX-ST-2018 (filed May 9, 2018).

[2] *See* David J. Redl, Assistant Secretary for Communications and Information and NTIA Administrator, *NTIA Identifies 3450-3550 MHz for Study as Potential Band for Wireless Broadband Use*, NTIA BLOG (Feb. 26, 2018),

proposed for study by NTIA, the non-federal operations for which SRI seeks STA would be in the same band as possible future broadband operations and would result in significant interference issues at that time. Such operations could make large swaths of the United States unusable for commercial broadband purposes.

As NTIA Administrator David Redl observed, the 3450-3550 MHz band could be "a key asset in our nation's broadband spectrum inventory."[3] Given the pending examination by NTIA and the importance of facilitating the availability of mid-band spectrum for 5G use, CTIA recently requested that the Commission adopt a freeze on the acceptance, processing, or grant of any non-federal applications in this band.[4]

Recognizing the points above and that a portion of this band for which SRI seeks access is under consideration for repurposing to commercial broadband use, CTIA requests that the Commission adopt the freeze as requested and reject the SRI applications for the 3450-3500 MHz frequencies for reasons cited in CTIA's pending freeze request. To the extent the Commission nonetheless grants these applications as filed, it should make clear to SRI that operation in the 3450-3500 MHz band may not be available for such secondary uses in the future, and SRI should be prepared to terminate its operations at that time.

Sincerely,

/s/ Kara Romagnino Graves

Kara Romagnino Graves
Director, Regulatory Affairs

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https://www.ntia.doc.gov/blog/2018/ntia-identifies-3450-3550-mhz-study-potential-band-wireless-broadband-use.

[3] *Id.*

[4] *See* Letter from Scott K. Bergmann, CTIA, to Marlene H. Dortch, Secretary, FCC (dated Apr. 27, 2018) (arguing that the Commission has the authority to adopt the freeze and that "it is in the public interest to ensure that new deployments of legacy services do not foreclose opportunities to facilitate next-generation wireless connectivity, which will benefit consumers, businesses, and the U.S. economy").