July 16, 2025

Via ECFS

Marlene H. Dortch
Secretary
Federal Communications Commission
Washington, DC 20554

Re: GN Docket No. 25-166, *Protecting our Communications Networks by Promoting Transparency Regarding Foreign Adversary Control;* SB Docket No. 25-157, *Modernizing Spectrum Sharing for Satellite Broadband*; SB Docket No. 25-180, *Satellite Spectrum Abundance;* ET Docket No. 18-295, *Unlicensed Use of the 6 GHz Band*, GN Docket No. 17-183, *Expanding Flexible use in Mid-Band Spectrum Between 3.7 and 24 GHz;* WT Docket No. 20-443, *Expanding Flexible Use of the 12.2-12.7 GHz Band*; GN Docket No. 22-352, *Expanding Use of the 12.7-13.25 GHz Band for Mobile Broadband or Other Expanded Use*

Secretary Dortch:

The Computer & Communications Industry Association (CCIA),[1] pursuant to 47 C.F.R. § 1.1206(b), files this notice of *ex parte* communication in the above-named dockets to record our meeting with Commissioner Olivia Trusty and Acting Legal Advisor William Holloway. Representing CCIA were Stephanie Joyce, Chief of Staff and Senior Vice President, Karina Perez, Director of the CCIA Space & Spectrum Policy Center, and Michael Marn, Senior Manager of Federal Affairs.

Attendees discussed the following:

- CCIA's domestic telecommunications advocacy generally, including the founding of the Space & Spectrum Policy Center in March 2025.

- CCIA's support for maximizing the commercial use of spectrum for broadband services while protecting existing services from harmful interference. We noted CCIA's support for unlicensed spectrum and for the Commission's work to expand use of the 6 GHz band,[2] the

[1] CCIA is an international nonprofit membership organization representing companies in the computer, Internet, information technology, and telecommunications industries. Together, CCIA's members employ nearly half a million workers and generate approximately one quarter of a trillion dollars in annual revenue. CCIA promotes open markets, open systems, open networks, and full, fair, and open competition in the computer, telecommunications, and Internet industries. A complete list of CCIA members is available at http://www.ccianet.org/members.

[2] ET Docket No. 18-295, *Unlicensed Use of the 6 GHz Band*, GN Docket No. 17-183, *Expanding Flexible use in Mid-Band Spectrum Between 3.7 and 24 GHz*, CCIA Comments (Mar. 27, 2024) and CCIA Reply Comments (Apr. 25, 2024); Letter from Stephanie A. Joyce to Marlene H. Dortch, FCC (July 31, 2024).

Lower 12 GHz band,[3] and the Upper 12 GHz band.[4] We also stated that CCIA supported re-authorization of the Commission's spectrum auction authority.

- CCIA's intention to file comments in SB Docket No. 25-157, *Modernizing Spectrum Sharing for Satellite Broadband*, and SB Docket No. 25-180, *Satellite Spectrum Abundance.* We noted that Low Earth Orbit (LEO) satellite broadband will help close the connectivity gap and that satellite connectivity is crucial during emergency events such as natural disasters. We further discussed satellite broadband's ability to reach truly remote areas, how to ensure network security for satellite broadband services, and how CCIA and its members propose to address the issue of orbital debris. Ms. Perez noted that some FCC rules, including the rules at issue in the *Modernizing Spectrum Sharing* docket, restrict the transmission angles of satellite signals, which in turn limits their service footprint. She also explained that the satellite service companies have been working both independently and cooperatively to establish space sustainability and security. Ms. Perez also noted that industry is consulting with the National Oceanic and Atmospheric Administration and the National Telecommunications and Information Administration on how best to address orbital debris and with the Department of Defense with regard to strengthening network security. We also discussed the upcoming WRC-27 Conference and whether these issues might be discussed there. CCIA stated that equivalent power-flux density (EPFD) limits were discussed at WRC-23, but no consensus or conclusions have been reached. We further noted that U.S. engagement in WRC-27 on satellite-related issues will be vital to preserving the nation's role as the leader in space deployment.

- CCIA's intention to file comments in GN Docket No. 25-166, *Protecting our Communications Networks by Promoting Transparency Regarding Foreign Adversary Control*, which will express support for the Commission's proposed rules and for disclosure and certification rules appropriately geared to protecting U.S. networks from foreign adversaries.

- CCIA's interest in potential efforts to update the Universal Service Fund with respect to ensuring continued broadband deployment. Commissioner Trusty noted that the Commission remains committed to supporting broadband access in remote areas and on Tribal lands.

* * * *

The attached materials were left with Commissioner Trusty and Mr. Holloway. CCIA is available to provide any additional information on these matters that might be helpful to the Commission.

Sincerely,

Stephanie Joyce
Chief of Staff and Senior Vice President
CCIA

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[3] WT Docket No. 20-443, *Expanding Flexible Use of the 12.2-12.7 GHz Band*; GN Docket No. 22-352, *Expanding Use of the 12.7-13.25 GHz Band for Mobile Broadband or Other Expanded Use*, CCIA Comments (Aug. 9, 2023).
[4] *Id.*

Cc: William Holloway, Acting Legal Advisor to Commissioner Trusty (*via electronic mail*)

Attachments

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About CCIA

CCIA is an international, not-for-profit trade association representing a broad cross section of communications and technology firms. For more than 50 years, CCIA has promoted open markets, open systems, and open networks. CCIA members employ more than 1.6 million workers, invest more than $100 billion in research and development, and contribute trillions of dollars in productivity to the global economy.

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CCIA SPACE & SPECTRUM POLICY CENTER

Low Earth Orbit (LEO) Broadband Access

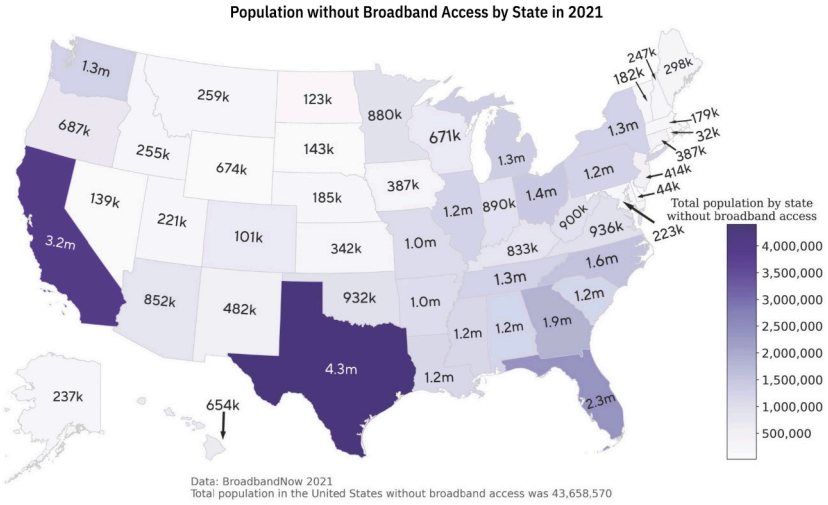
The Computer & Communications Industry Association (CCIA) remains committed to supporting the competitive provisioning of broadband services on a technologically neutral basis. Satellite-based transmission services have a vital role to play in ensuring that the United States has ubiquitous, robust, resilient, and accessible broadband connectivity. CCIA's newly-formed Space & Spectrum Policy Center aims to expand and strengthen our advocacy on these crucial issues.

Why LEO Broadband?

LEO broadband has the potential to increase accessibility, reduce latency, and increase speed of high-speed connectivity. It has the potential to reach the 43.7 million Americans in urban, remote, and difficult-to-access areas who are currently without broadband. According to CCIA's Research Center, expanding LEO broadband coverage could increase U.S. GDP by over $29 billion annually.

Robust LEO broadband connectivity enables the delivery of solutions to critical, timely challenges in an effective and reliable manner. For instance, LEO broadband can provide vital emergency connectivity to both rural and urban communities during natural disasters. In 2023 alone, the U.S. faced 28 separate billion-dollar weather events, leading to the displacement of 1.2-1.7% of the population. LEO satellites' capability to deliver emergency communications in these crucial times can facilitate rapid relief for those who need it most.

43.7 million Americans Lack Broadband Access, Including Millions of Rural Americans Living in States with Mostly Urban Populations



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Access to Satellite Spectrum

Authorizing Spectrum to Meet Demand: Over the last two decades, the space satellite industry has rapidly expanded to meet ever-increasing demand. In 2024, 77% of the 2,873 space launches were communications satellites. CCIA estimates the total addressable market in the U.S. for LEO broadband is between $20.8 and $62.9 billion per year.

To reach this potential and for the U.S. to maintain a global competitive advantage in satellite communications, more spectrum must be made available across the low, middle, and high spectrum bands.

International Collaboration: Spectrum allocation is an international process in which the U.S. has maintained decades-long leadership. With 80% of the 2027 World Radiocommunication Conference (WRC 27) focused on Space, the U.S. must remain engaged as a leader in the International Telecommunications Union (ITU) and future WRCs. National and international coordination will be required as companies work to provide global broadband access through LEO satellites.

The U.S. must continue sustained investment and leadership in the ITU and WRC 27. Without it, other countries will fill the void, threatening America's national and economic security interests.

Industry and Regulation

Modernizing the Regulatory Framework: In 2023, the Federal Communications Commission (FCC) took a major step toward promoting competition and innovation in the satellite communications market by establishing the Space Bureau. The FCC continued its efforts in 2024 by adopting the *Space Innovation Order* (FCC 24-84) to enable collaboration between satellite and terrestrial service providers. This order aims to supplement terrestrial coverage with space-based services and reallocate certain terrestrial spectrum bands for satellite use. These efforts are steps toward meeting the growing demand for connectivity and ensuring that consumers have access to reliable broadband services.

The Federal Aviation Administration (FAA) also plays a critical role in the satellite industry by regulating launch and reentry activities. Though the FAA has taken steps to streamline its licensing process, the backlog of launch licenses and the complexity of the regulatory framework continue to pose challenges beyond LEO satellites to the entire space industry.

To unlock the full potential of the satellite industry, the U.S. must streamline interagency coordination to enable timely authorizations and efficient spectrum allocations.

Space Safety & Sustainability: Space safety and sustainability are key priorities for LEO companies. They are crucial to safeguarding American access and use of space and maximizing the benefits of space technologies and services for all of humanity. As the number of launches increases, responsible practices — such as deorbiting, collision avoidance, and safe disposal — should be at the forefront of LEO companies' work and design.

LEO operators are actively engaged in operator-to-operator coordination and have developed a number of best practices, including the American Institute of Aeronautics and Astronautics' "Satellite Orbital Safety Best Practices." Companies, particularly those with large LEO constellations, are prioritizing safe and timely disposal of satellites, effective satellite maneuverability, and sharing orbital locations and maneuverability plans with other satellite operators. CCIA's Space & Spectrum Policy Center looks forward to working with policymakers and stakeholders to ensure these practices are adopted around the globe.