



February 18, 2026

Via ECFS

Marlene H. Dorch
Secretary
Federal Communications Commission
45 L Street, NE
Washington, DC 20554

Re: SB Docket 25-305, *Facilitating More Intensive Use of Upper Microwave Spectrum*

The Computer and Communications Industry Association (CCIA)¹ submits these reply comments in the going Federal Communications Commission (FCC or Commission) Notice of Proposed Rulemaking (NPRM) published on the Federal Register on December 3, 2025.²

In its initial comments, CCIA established that the “non-stationary orbit (NGSO) industry was still developing when the Spectrum Frontiers Report and Order was adopted in 2016, but now it is a cornerstone of broadband innovation.”³ CCIA argued that this growth underscores the need for the 24 Gigahertz (GHz), 28 GHz, upper 37 GHz, 39 GHz, 47 GHz, and 50 GHz bands (collectively known as the Upper Microwave Flexible Use Service (UMFUS) bands) for more efficient use. Commenters like the Commercial Space Federation also stated that “over the last year alone, the Commission granted licenses for hundreds of earth stations and thousands of additional satellites in these bands that will bring high-speed, low-latency broadband and 6G mobile-satellite service to millions more consumers, enterprises, and government users throughout the country.”⁴

To utilize these bands efficiently, CCIA recommended the Commission implement a non-exclusive light licensing framework.⁵ Under this framework, individual deployments must be registered and self-coordinated utilizing a third-party registration system, adhering to a co-primary and first-in-time operational principle. Companies and organizations were overall supportive of this approach and of CCIA's stance that existing §25.136 technical criteria are burdensome.⁶ With some commenters like the Satellite Industry Association stating that

¹ 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.

² SB Docket No. 25-305, *Notice of Proposed Rulemaking*, FCC 25-70 (rel. Oct. 28, 2025), published at 90 Fed. Reg. 55702 (Dec. 3, 2025) (the “NPRM”).

³ SB 25-305 Comments of CCIA at 1 ([Jan. 3, 2026](#)).

⁴ SB 25-305, Comments of Commercial Space Federation at 2 ([Jan. 20, 2026](#)).

⁵ SB 25-305, Comments of CCIA at 2 (Jan. 3, 2026).

⁶ See SB 25-305, Comments of Eutelsat S.A. and Worldvu Satellites Ltd. at 3 (“The best way for the Commission to promote extensive use of the upper microwave spectrum is to allow unfettered operation where no established facilities are nearby on a first-come, first served basis.”) ([Jan. 20, 2026](#));



“[d]emand for satellite services continues to accelerate, and the Commission should not delay changes to Section 25.136 that would immediately encourage further earth station deployments while the light licensing framework is further developed.”⁷

While there were comments supporting the market-based approach, the record demonstrates broad support for light licensing. As correctly asserted by Open Technology Institute at New America and Public Knowledge, “The so-called ‘Market-Based’ Approach to Coordinating FSS Earth Stations in UMFUS Bands is detrimental to the Public Interest in Better Connectivity, Innovation and Competition.”⁸ To help ease concerns from existing UMFUS license holders, CCIA additionally encouraged the Commission to establish a dispute resolution framework for situations where co-primary users are unable to coordinate successfully.⁹ This framework is essential to ensure a clear, predictable path forward that minimizes service interruptions and encourages continued investment, and avoids spectrum squatting.

Ultimately, the docket makes a compelling case that the Commission should license these bands on a co-primary basis and replace section 25.136 with a light licensing framework to ensure swift coordination between UMFUS and FSS operators across all UMFUS bands.

Sincerely,

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CCIA

Comments of Space Exploration Holding LLC at 3 (“Light licensing is readily achievable for all Upper Microwave spectrum, including 24 GHz, 28 GHz, upper 37 GHz, 39 GHz, 47 GHz, and 50 GHz, which share similar use cases.”) ([Jan. 20, 2026](#)); Comments of Norwood Space Corp. at 4 (“A light licensing framework would not only facilitate timely earth station deployment and the critical space-based operations that require reliable ground networks, but also would protect the limited terrestrial operations in the band, enhance transparency, and promote efficiency by providing operators with accurate information regarding the relevant interference environment.”) ([Jan. 20, 2026](#)); Comments of Logos Space Service Inc. at 4 (“Logos supports the Commission’s proposal to replace the complex and restrictive earth station siting and coordination criteria outlined in Section 25.136 of its rules with the streamlined light-licensing framework already in use for the 70/80/90 GHz bands.”) ([Jan. 20, 2026](#)).

⁷ SB 25-305, Comments of Satellite Industry Association at 8 ([Jan. 20, 2026](#)).

⁸ SB 25-305, Comments of Open Technology Institute at New America and Public Knowledge at 13 ([Jan. 20, 2026](#)).

⁹ SB 25-305, Comments of CCIA at 3 (Jan. 20, 2026).