



May 11, 2026

Via ECFS

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

Re: SB Docket No. 26-54 Spectrum Abundance for Weird Space Stuff

Dear Secretary Dorch,

The Computer & Communications Industry Association (CCIA),¹ is pleased to respond to the Notice of Proposed Rulemaking issued by the Federal Communications Commission (“FCC” or “Commission”) in the above-named docket.² CCIA supports the Commission’s proposal to expand spectrum access; however, we strongly recommend that "piggybacking" on existing allocations be utilized only as an interim solution while the Commission works toward allocating dedicated, primary spectrum for these emerging technologies.

CCIA believes that the Commission’s efforts to facilitate immediate access to spectrum for these new and emerging technologies is commendable. Additionally, by streamlining the licensing process and identifying underutilized bands for these "weird" space applications, the Commission is lowering the barrier to entry for innovators.

CCIA supports the NPRM’s proposal on secondary-market access and "piggybacking" on existing allocations to accelerate deployment (NPRM ¶¶28-31). However, the Commission must approach this as a temporary bridge rather than a permanent solution. Secondary users are often required to cease operations if they interfere with primary users, which would put secondary users at a disadvantage due to unreliable connectivity. As such, CCIA encourages the Commission to look at new bands allocated for these emerging technologies.

Providing "weird space stuff" with its own home in the electromagnetic spectrum will also allow these technologies to scale without being tethered to the legacy requirements of traditional telecommunications satellites. It ensures that as our use of space becomes more complex, our regulatory framework is built for growth, not just survival.

CCIA appreciates the opportunity to participate in this proceeding and is available to provide any additional information that might be helpful to the Commission.

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 SB Docket No. 26-54, “Spectrum Abundance for Weird Space Stuff” Notice of Proposed Rulemaking, (April 9, 2026), Published at 91 Fed. Reg. 17914, (the “NPRM”).



Respectfully submitted,

Karina Perez
Director, Space & Spectrum Policy Center
Computer & Communications Industry Association
kperez@ccianet.org

May 11, 2026