



October 13, 2026

BY ELECTRONIC FILING

Marlene H. Dortch
Secretary
Federal Communications Commission
45 L Street, N.E.
Washington D.C. 20554

Re: Docket No.24-30 Office of International Affairs Seeks Comment on
Recommendations Approved by the World Radiocommunication Conference Advisory
Committee

Dear Secretary Dortch,

The Computer & Communications Industry Association (“CCIA”)¹ submits these comments in response to the Federal Communications Commission (“Commission”) Public Notice seeking feedback on proposals to the 2027 World Radiocommunication Conference Advisory Committee (“WAC”).² In particular, CCIA supports the proposed View A on Agenda Item 9.2, which seeks to modernize Article 22 equivalent power flux-density (“EPFD”) limits.

Current Article 22 EPFD limits are outdated and overly burdensome. CCIA commissioned a report that demonstrated that updating EPFD limits would alleviate constraints to non-geostationary orbit (“NGSO”) constellations while preserving GSO operational integrity.³ The Commission’s May 2026 *Modernizing Spectrum Sharing for Satellite Broadband* Report and Order acknowledged the outdated nature of these limits and replaced them with a performance-based sharing framework grounded in real-world operating conditions.⁴

CCIA supports View A as it seeks to update Article 22 EPFD limits without adding the additional constraint of a 100 percent of the time “never to be exceeded” EPFD limits proposed in View B. While View A has a regulatory precedent and technical analysis, View B does not tie

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 *Office of International Affairs Seeks Comment on Recommendations Approved by the World Radiocommunication Conference Advisory Committee, Public Notice, OIA Docket No. 24-30, DA 26-1052 (rel. Sept. 29, 2026) (“Public Notice”).*

³ See Cornel Balint & Sebastian Ventz, *Considerations on Interference Impact in GEO-LEO Spectrum Sharing Systems* (April 14, 2026), <https://ccianet.org/research/reports/considerations-on-interference-impact-in-geo-leo-spectrum-sharing-systems/>.

⁴ See *Modernizing Spectrum Sharing for Satellite Broadband*, SB Docket No. 25–157, 91 Fed. Reg. 26928. ([May 13, 2026](#)).



the never to be exceeded EPFD limits to quantifiable protection criteria or technical analysis demonstrating why an additional level of protection is necessary. Imposing the unnecessary 100 percent of the time EPFD limits would needlessly restrict critical NGSO capabilities without offering any demonstrable improvements in GSO protection.

Updating these limits is essential to expanding global digital connectivity. Modern NGSO constellations are uniquely positioned to deliver high-speed, low-latency broadband to millions of users in unserved, underserved, rural, and remote areas, while also providing critical capacity to help bridge global connectivity gaps. As widespread satellite broadband adoption could generate an additional \$863 billion in global economic output and create approximately 21 million new jobs,⁵ it is critical that operators are able to provide more efficient services as soon as possible rather than leaving known structural deficiencies in place for at least another four years.

For these reasons, CCIA encourages the adoption of View A as it will help align international regulatory frameworks with modern engineering realities, protect operational GSO networks using updated metrics, and enable NGSO operators to deliver transformative satellite broadband connectivity worldwide.

Sincerely,

Karina Perez
Director, Space & Spectrum Policy Center
Computer & Communications Industry Association

⁵ See Oxford Economics, *The Global Value of LEO Satellite Broadband Services* (April 2026), <https://www.oxfordeconomics.com/resource/the-global-value-of-leo-satellite-broadband-services/>