

Federal Register Notice: 89 FR 12871, <https://www.federalregister.gov/documents/2024/02/20/2024-03400/request-for-information-on-the-national-spectrum-research-and-development-plan>, February 20, 2023.

Request for Information on the National Spectrum Research and Development Plan

The OnGo Alliance

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March 21, 2024

Ms. Mallory Hinks
NITRD NCO
2415 Eisenhower Avenue
Alexandria, VA 22314

Re: Request for Information on the National Spectrum Research and Development Plan

Dear Ms. Hinks:

The OnGo Alliance¹ (“the Alliance”) appreciates the opportunity to provide comments² in response to the Request for Information (“RFI”) issued by the Networking and Information Technology Research and Development (NITRD) National Coordination Office (NCO) on the National Spectrum Research and Development Plan (“R&D Plan”).³

The Alliance shares the assessment articulated in the National Spectrum Strategy that “the United States is uniquely positioned to embrace a whole-of-Nation approach to advance the state of technology for dynamic forms of sharing,”⁴ and we are pleased to offer our perspectives on key innovation areas for spectrum research and development that will achieve “measurable advancements in state-of-the-art spectrum science and engineering.”⁵

The CBRS experience is a shining example of state-of-the-art spectrum science and engineering in the context of dynamic spectrum sharing. Since the authorization of full commercial service in early 2020, approximately 370,000 CBRS devices (CBSDs) are in operation, facilitated by over 250 FCC-certified models of CBSDs, more than 700 FCC-certified models of CBRS end-user devices and components, and a

¹ The OnGo Alliance is a coalition of over 120 member companies, including mobile operators, cable operators, managed service providers, mobile virtual network operators, fixed wireless operators, enterprises, and more. Our members have deployed 3GPP technology-based solutions (both 4G LTE and 5G NR) in the Citizens Broadband Radio Service (CBRS) band to enable in-building and outdoor broadband coverage and capacity expansion at massive scale. Since 2016, the OnGo Alliance and its members have focused time, energy, and innovation to develop reliable, secure, and cost-effective wireless services for the 3.5 GHz CBRS band. The Alliance also established an effective product certification program for OnGo ensuring multi-vendor interoperability, with over 90 models of CBRS base stations (CBSDs) having achieved OnGo certification to date.

² This document is approved for public dissemination. The document contains no business-proprietary or confidential information. Document contents may be reused by the government in the National Spectrum R&D Plan and associated documents without attribution.

³ NITRD NCO, Request for Information on the National Spectrum Research and Development Plan; *available at* <https://www.federalregister.gov/documents/2024/02/20/2024-03400/request-for-information-on-the-national-spectrum-research-and-development-plan> (“RFI”).

⁴ Available at <https://www.ntia.gov/issues/national-spectrum-strategy>.

⁵ RFI.

vast network of over 1,000 operators satisfying a wide range of use cases, including mobile broadband, fixed wireless access, and enterprise private networks – all on a shared basis under the management of commercial Spectrum Access System (SAS) technology and solutions.

With zero reports of interference from incumbent federal and commercial users, the CBRS experience demonstrates that dynamic spectrum sharing works and should be a model for sharing in other frequency bands. That being said, there are opportunities to enhance and improve upon dynamic spectrum sharing technology and process. We encourage the National Science Foundation (NSF) and other federal agencies to work closely with the Alliance and other organizations with significant technical and commercial expertise as well as institutional knowledge regarding dynamic spectrum sharing and the ways in which it can be advanced. NSF and other agencies should encourage researchers to work closely with the wireless industry to help develop mid- and long-term research areas that are informed by the needs of the wireless community and the realities of commercial spectrum access, and to leverage some of the spectrum sharing technology that the wireless industry has already developed or is in the process of developing.

With regard to a specific element in the R&D Plan:

7. Terminology and definitions relevant for spectrum R&D. One term of interest is “Dynamic Spectrum Sharing” which is a focus of the National Spectrum Strategy but was not defined.

The Alliance defines DSS as the use of automation technology together with information sourced from databases, sensors and/or informing portals to manage access on a near real-time basis to spectrum by more than one user in the same or nearby geographic areas while minimizing harmful interference and maximizing efficient use.

The Alliance and our members stand ready to work with NTIA, the Federal Communications Commission, the other federal agencies, and our fellow industry partners to ensure the vision articulated in the NSS becomes a reality.

Respectfully submitted,

/s/ Preston Marshall
Preston Marshall
Chair

/s/ Stephen Rayment
Stephen Rayment
President

March 21, 2024