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March 19, 2026

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

Re: Ex Parte Comments on Public Draft of NPRM In the Matter of Spectrum Abundance for Weird Space Stuff (SB Docket No. 26-54)

Dear Ms. Dortch:

The Aerospace and Flight Test Radio Coordinating Council, Inc. ("AFTRCC") recognizes the need for emergent space operations, like all aerospace operations, to have access to sufficient spectrum. In the draft Notice of Proposed Rulemaking ("NPRM") in the above referenced docket, FCC-CIRC 2603-04, the Commission signals its intent to initiate a proceeding to consider making spectrum allocations in several radiofrequency bands to the Space Operations Services ("SOS") or allow spectrum leasing to meet this need. AFTRCC looks forward to participating in this proceeding to ensure the continued protection of primary aeronautical mobile telemetry ("AMT") in support of flight testing. AFTRCC takes this opportunity to make several requests for changes to the draft NPRM text before it is released to help facilitate a correspondingly robust record on this matter.

AFTRCC is the Commission-designated coordinator of the 2360-2395 MHz Band for non-Federal AMT uses which enjoys co-primary status in this band with Federal AMT. AFTRCC also is responsible for coordinating other uses of this radiofrequency spectrum and uses of adjacent frequency bands with the purpose of protecting real-time receipt of AMT data essential to the flight testing of military and commercial aircraft, including increasingly complex and sophisticated uncrewed aircraft systems. AFTRCC has a decades-long collaboration with the Department of Defense ("DOD") Area Frequency Coordinators ("AFCs") and the DOD test ranges, ensuring interference-free operation of AMT on a co-equal basis with Federal flight test operations conducted by the DOD in the heavily used 2360-2395 MHz Band at hundreds of non-Federal and Federal AMT receive sites distributed in the majority of States across the country. Of great relevance to the draft NPRM, AFTRCC coordinates Wireless Communications Service ("WCS") base stations operating in the 2345-2360 MHz band to protect AMT operations above 2360 MHz against risks of harmful interference that may be caused by the WCS operations.[1]

[1] 47 C.F.R. § 27.73(a) ("WCS licensees operating base and fixed stations in the 2345-2360 MHz band must, prior to operation of such stations, achieve a mutually satisfactory coordination agreement with the AMT entity(ies) (*i.e.*, FCC licensee(s) and/or Federal

AFTRCC has reviewed the draft NPRM with great interest. AFTRCC was glad to see that the Commission does *not* intend to consider allocations in this proceeding overlapping with the recent Part 26 allocations for commercial space launch on a secondary basis, including the 2360-2395 MHz Band.[2] AFTRCC applauds the Commission for recognizing that the incipient implementation of new secondary Part 26 commercial space launch operations will inherently prove to be complex. This reality justifies the Commission's decision to refrain from considering in the above-referenced docket any new allocations or rule changes in these bands for SOS beyond the recently adopted Part 26 allocations which are secondary to primary incumbent uses, such as to the primary AMT allocation in the 2360-2395 MHz Band. AFTRCC urges the Commission to retain the clear statement in footnote 47 of the draft NPRM as to the limited scope of the bands that would be under consideration for new SOS operations in the rulemaking.

In addition, AFTRCC urges the Commission to clearly request comments about how spectrum uses under the potential new SOS allocations (or through spectrum leasing) may affect incumbents in adjacent bands, including primary non-Federal and Federal AMT operations in 2360-2395 MHz. For example, in the draft NPRM, the Commission seeks comment on whether it should make allocations for SOS in both Earth-to-space[3] and space-to-Earth directions in the 2350-2360 MHz band.[4] Out-of-band emissions from prospective SOS operations occurring in those bands may present an interference threat to AMT operations in the immediately adjacent 2360-2395 MHz Band and therefore require coordination with AFTRCC. Accordingly, AFTRCC urges the Commission to modify paragraph 81 to specifically seek comment from proponents of new SOS allocations or spectrum leasing rules to "create" additional spectrum for emergent space operations in these frequencies addressing the questions of whether there may be impacts to AMT operations and how the risk of such impacts can be mitigated. In particular, AFTRCC urges the Commission to modify paragraph 81 as follows:

> 81. We also seek comment on whether there should be any technical or geographic restrictions or limitations on the use of the 2305-2315 MHz and 2350-2360 MHz bands that are different from technical or geographic restrictions in the 2320-2345 MHz band. For example, footnote US100 provides for use of the 2310-2320 MHz band and 2345-2360 MHz band for Federal aeronautical telemetering and associated telecommand

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operator(s)) for any AMT receiver facility within 45 kilometers or radio line of sight, whichever distance is larger, of the intended WCS base or fixed station location. The coordinator for the assignment of flight test frequencies in the 2360-2390 MHz band, Aerospace and Flight Test Radio Coordination Council (AFTRCC) or successors of AFTRCC, will facilitate a mutually satisfactory coordination agreement between the WCS licensee(s) and AMT entity(ies) for existing AMT receiver sites.")

2 *See* NPRM, ¶ 20 n. 47 ("This *NPRM* does not seek comment on matters involving spectrum for space operations governed by part 26.")

3 *Id.* ¶ 79.

4 *Id.* ¶ 81.

> operations for flight testing of manned or unmanned aircraft, missiles, or major components thereof, on a secondary basis to WCS. Would additional technical or geographic restrictions on earth station uplinks in these bands be necessary to protect such Federal secondary allocations from harmful interference? We also seek comment on whether coordination with Aerospace and Flight Test Radio Coordinating Council (AFTRCC) and Federal AMT coordinators would be needed to protect aeronautical mobile telemetry ("AMT") operations in the 2360-2395 MHz band, much as WCS base stations operating in the 2350-2360 MHz band must coordinate today with AFTRCC. Similarly, would additional technical or geographic restrictions be necessary to protect the NASA radioastronomy site in Goldstone from harmful interference in the 2305-2320 MHz band, as required for WCS base stations operating in that band under footnote US97? Would a requirement for prior coordination of any earth stations seeking to provide command uplinks in the 2305-2320 MHz band within 145 kilometers of Goldstone be adequate to provide the same level of protection that NASA currently has for WCS operations in the 2305-2320 MHz band? Would new earth station uplink operations be compatible with sensitive Moon bounce operations conducted under the amateur radio service in the 2305-2310 MHz band? We also seek comment on whether it may be possible to allow downlinks in the 2305-2315 MHz and 2350-2360 MHz bands through a secondary SOS allocation or footnote to the United States Table, without causing interference or economic harm to WCS licensees or other authorized Federal or non-Federal spectrum users in the same or adjacent spectrum, including to Federal and non-Federal AMT operators in the 2360-2395 MHz Band

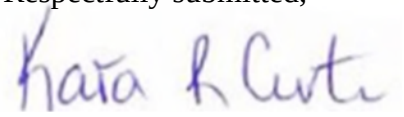
In addition, there may be risks to AMT operations from out-of-band emissions from SOS operations were such operations authorized in the 2345-2350 MHz band, depending on the technical characteristics of the SOS transmissions. Accordingly, to help ensure that this potential risk is addressed in the record, AFTRCC respectfully requests that the Commission make slight changes to paragraph 73 of the draft NPRM by adding text or a footnote after the following sentence: "73. . . . In addition, footnote US100 provides for use of the 2345-2360 MHz band for Federal aeronautical telemetering and associated telecommand operations for flight testing of manned or unmanned aircraft, missiles, or major components thereof, on a secondary basis to WCS. Would additional technical or geographic restrictions on earth station uplinks in the 2345-2350 MHz band be necessary to protect such Federal secondary allocations from harmful interference?" The proposed text (or footnote) would read:

> The near adjacent 2360-2395 MHz band is allocated on a primary basis for Federal and non-Federal aeronautical mobile telemetry ("AMT") for flight testing and WCS base station operations in the 2345-2360 MHz band must be coordinated to ensure AMT receive stations are protected. *See* 47 C.F.R. § 27.73(a). Would additional technical or geographic restrictions on earth station uplinks in the 2345-2350 MHz band be necessary to protect Federal and non-Federal flight test operations in the 2360-2395 MHz band from harmful interference caused by SOS out-of-band emissions?

AFTRCC appreciates the Commission's consideration of the foregoing suggestions. If there are any questions for AFTRCC, or if the Commission would benefit from receiving any further information from AFTRCC, please contact the undersigned.

This letter is being filed consistent with the procedures in Section 2.106 of the Commission's Rules.[5]

Respectfully submitted,



Kara R. Curtis
President

[5] 47 C.F.R. §2.106.