

Below is a draft statement for your consideration regarding the CSMAC Search for 500 MHz recommendations.

**For the record:** I would like to offer the following points for consideration regarding the full committee's consideration of the Search for 500 MHz Subcommittee recommendations. My support would be qualified with the following concerns over how these recommendations would be implemented:

- Regarding the two-stage approach outlined for 1755-1850 MHz (*slide 2*), any reallocation decisions must address upfront how relocation will be addressed for users across the entire band. Since this band is of highest priority to industry, as noted in the slides, auction revenue could be optimized for the full 95 MHz if relocation issues, such as replacement spectrum and timing for relocation of incumbents, were dealt with as early as possible to provide adequate planning and preparation time for both prospective bidders and current incumbents. Bifurcating the process by needlessly delaying challenging decisions associated with clearing the entire band would sacrifice a reasoned, longer-term decision cycle for the near-term expediency of holding the "first" auction in this band. It is also difficult to support this language without the benefit of specific details of which systems could retune temporarily to operate in spectrum higher in the band with relative ease versus those that would require exclusion zones on a short- or long-term basis. Requiring systems to move twice for two different auctions is neither equitable nor efficient.
- Regarding the spectrum principle (*slide 5*) that "clearing spectrum should be the goal," this should include the caveat "when feasible." Auctioning cleared spectrum is the clearest path forward for optimizing auction revenue, and should be pursued whenever possible. However, it is difficult to support this recommendation for specific bands without a full understanding of the costs and benefits of full clearance, particularly when key considerations such as replacement spectrum are not yet known. The latter is an especially important factor in light of the lack of "open" bands to which incumbents may easily be moved, which is itself a factor that could add time and cost to a cost-benefit analysis of how and when a band may be auctioned.
- With regard to pursuing short-term sharing options in order to make the 1755-1780 MHz sub-band available, it is critical that such decisions occur against a broader backdrop of updating Federal policies for sharing between Federal and non-Federal users, including, perhaps most importantly, interference protection measures and enforcement tools. While the slides note that limited interference and sharing "will be generally preferable over exclusion zones," the reality is that limited interference would be politically difficult to sustain once an incumbent begins deploying to scale in a band and consumer expectations for assured service levels are set. This challenging dynamic has played out in recent years regarding garage door openers operating in spectrum that began to be more heavily used by military installations as part of required LMR upgrades.

While database information or "uncoordinated sharing" may be feasible options in some cases, for secure systems, disclosure of where and when a system operates may make database-oriented solutions difficult to implement. Further, if sharing on such terms is temporary rather than permanent in nature, a cost benefit analysis should be used to determine whether the cost and time of putting in place such tools outweighs the benefit of clearing a band over the longer-term when comparable replacement spectrum is available. Further, operational considerations of incumbents must be paramount when weighing the relevant implications of exclusion zones versus sharing measures.