



**UNITED STATES DEPARTMENT OF COMMERCE**  
**National Telecommunications and**  
**Information Administration**  
Washington, D.C. 20230

August 14, 2023

Mr. Ronald T. Repasi  
Acting Chief, Office of Engineering and Technology (OET)  
Federal Communications Commission  
45 L Street, NE  
Washington, DC 20554

Mr. Joel Taubenblatt  
Acting Chief, Wireless Telecommunications Bureau (WTB)  
Federal Communications Commission  
45 L Street, NE  
Washington, DC 20554

Re: Promoting Investment in the 3550-3700 MHz Band  
GN Docket Nos. 15-319 and 17-258

Dear Messrs. Repasi and Taubenblatt:

By this letter, the National Telecommunications and Information Administration (NTIA) provides notice as part of the above-referenced proceedings<sup>1</sup> of (1) replacement of the portal system used to protect certain federal facilities from Citizens Broadband Radio Service (CBRS) operations in the 3550-3700 MHz (3.5 GHz) band and (2) the addition of a new federal facility to the list of protected Department of Defense (DoD) sites. Consistent with our established coordination procedures for the 3.5 GHz band, NTIA requests that the Federal Communications Commission (Commission) direct the CBRS Spectrum Access System (SAS) administrators to implement these changes.

NTIA and DoD have worked closely with the Commission as it has implemented rules governing CBRS in the 3.5 GHz band. With CBRS, the Commission established a groundbreaking spectrum-sharing paradigm that has enabled commercial access to mid-band spectrum for 5G deployments, demonstrating the success of a collaborative partnership among stakeholders in government and industry. This ongoing spectrum-sharing effort demonstrates how, collectively, we can move toward more dynamic sharing, while protecting key government systems that are vital for national security and other public services.

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<sup>1</sup> See, e.g., *Amendment of the Commission's Rules with Regard to Commercial Operations in the 3550-3650 MHz Band*, GN Docket No. 12-354, Report and Order and Second Further Notice of Proposed Rulemaking, 30 FCC Rcd 3959 (2015); *Amendment of the Commission's Rules with Regard to Commercial Operations in the 3550-3650 MHz Band*, GN Docket No. 12-354, Order on Reconsideration and Second Report and Order, 31 FCC Rcd 5011 (2016); *Promoting Investment in the 3550-3700 MHz Band*, GN Docket No. 17-258, Order, 33 FCC Rcd 4987 (WTB/OET 2018); *SAS Commercial Approval Public Notice*.

## **Replacement of the Federal CBRS Portal System**

DoD and the military services operate developmental and operational test and evaluation ranges and facilities throughout the country, of which several host operations in the 3.5 GHz band. Each range specializes in different types of testing to further the specific missions of the military services that utilize these facilities. Developmental, operational, and integrated testing and evaluation provide data to inform design improvements, production readiness, and combat readiness. In the 3.5 GHz band, designated federal facilities (test and training ranges) are generally protected by portal-activated dynamic protection areas (P-DPAs). Federal operators utilize a dedicated portal to schedule their test and training activities in the band.<sup>2</sup> This approach helps to ensure an interference-free environment for DoD's mission-critical test and training operations while minimizing disruption to commercial users.

To improve the security, reliability, and resiliency of the scheduling portal, DoD has developed an automated system—the Telecommunications Advanced Research and Dynamic Spectrum Sharing System (TARDyS3)—to replace the manual scheduling portal currently used to activate the P-DPAs. The TARDyS3 is a DoD calendar-based tool that will support the expeditious communication of spectrum use at test and training ranges in the 3.5 MHz band through autonomous data transfer to Spectrum Access Systems (SASs). Scheduling via TARDyS3 is designed to enable DoD users to reserve their spectrum use and communicate the use of a given CBRS channel at a given time at the designated P-DPA. DoD and NTIA have engaged with the Commission and the SAS administrators throughout the TARDyS3 development process to ensure that the portal is compatible with existing SAS software and configurations. NTIA anticipates that the TARDyS3 will be ready imminently and would be activated soon after receipt of the FCC's concurrence.

We also note that, under Section 96 of the Commission's rules, SASs must operate without any connectivity to any military or other sensitive federal database or system.<sup>3</sup> If necessary, NTIA hereby requests waiver of Section 96.63(n)(1) to facilitate the implementation and use of TARDyS3 for the protection of P-DPAs.

## **Addition of Protected Military Site**

DoD has completed an assessment of its systems and operational needs at the U.S. Naval

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<sup>2</sup> See *Wireless Telecommunications Bureau and Office of Engineering and Technology Establish Procedure and Deadline for Filing Spectrum Access System Initial Commercial Deployment Proposals*, Public Notice, 33 FCC Rcd 7390, para. 7 (WTB/OET 2018); *Wireless Telecommunications Bureau and Office of Engineering and Technology Announce Five Spectrum Access System Administrators to Begin Initial Commercial Deployments in the 3.5 GHz Band*, GN Docket 15-319, Public Notice, 34 FCC Rcd 8106, para. 7 (WTB/OET 2019); *Wireless Telecommunications Bureau and Office of Engineering and Technology Approve Four Spectrum Access Administrators for Full Scale Commercial Deployment in the 3.5 GHz Band and Emphasize Licensee Compliance Obligations in the 3650-3700 MHz Band Under Part 96*, GN Docket No. 15-319, Public Notice, 35 FCC Rcd 117, para. 5 (WTB/OET 2020) (*SAS Commercial Approval Public Notice*). See also *Promoting Investment in the 3550-3700 MHz Band*, GN Docket No. 17-258, Order, 33 FCC Rcd 4987 (WTB/OET 2018).

<sup>3</sup> 47 C.F.R. § 96.63(n)(1).

Air Station Patuxent River, Maryland and has defined a new P-DPA to protect this facility.<sup>4</sup> The additional protection requirements for Patuxent River is captured in the P-DPA Keyhole Markup Language (KML) file (P-DPAS.kml) available on NTIA's website.<sup>5</sup>

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NTIA looks forward to continuing its collaboration with the Commission, DoD, and industry to protect the federal 3550-3700 MHz band radar systems while minimizing constraints on CBRS operations. Should you have any questions, please contact me or Edward Drocella, Chief, Spectrum Engineering and Analysis Division, Office of Spectrum Management, at edrocella@ntia.gov or (202) 482-2608.

Sincerely,

Charles Cooper  
Associate Administrator  
Office of Spectrum Management

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<sup>4</sup> See Letter from Charles Cooper, Assoc. Admin., Office of Spectrum Mgt., NTIA, to Ronald T. Repasi, Chief (Acting) OET, and Donald Stockdale, Jr., Chief, WTB, FCC (Jun. 23, 2020), and Letter from Charles Cooper, Assoc. Admin., Office of Spectrum Mgt., NTIA, to Ronald T. Repasi, Chief (Acting) OET, and Donald Stockdale, Jr., Chief, WTB, FCC (Jan. 22, 2020).

<sup>5</sup> The 3.5 GHz band KML files used by the SAS operators are available on NTIA's website: <https://ntia.doc.gov/fcc-filing/2015/ntia-letter-fcc-commercial-operations-3550-3650-mhz-band>.