



April 17, 2023

The Honorable Alan B. Davidson
Assistant Secretary for Communications and Information
National Telecommunications and Information Administration (NTIA)
U.S. Department of Commerce

RE: NTIA-2023-0003

Dear Assistant Secretary Davidson:

On behalf of the Regional Defense Partnership for the 21st Century (RDP-21), we appreciate the opportunity to provide comment on the development and implementation of a National Spectrum Strategy for the United States. RDP-21 has a long history of supporting U.S. Navy activities and we are happy to support the advancement of the Navy mission.

RDP-21 is comprised of the city and county governments within Ventura County, as well as the defense industry and agribusiness. We were founded in the mid-1990s to support the mission of what is now Naval Base Ventura County, support investment in the necessary infrastructure to enhance mission capability and counter potential actions that impact mission viability. We continue to support the Navy mission by ensuring that policies at all levels of local government are compatible with military aircraft and the activities of the fleet.

The Point Mugu Sea Range and the warfighting systems that test and train on the Range utilize a significant amount of the RF spectrum to support its operations. Areas of key importance include Electronic Warfare threat systems, telemetry, target control, and safety on the Range as well as critical warfighter radars and weapon systems.

The National Broadband Plan laid out an approach to transfer the use of 500 Mega Hertz (MHz) of RF spectrum from Federal users to the commercial sector. This transference is accomplished via auctions for licensing of the federal bands to commercial entities. Proceeds from these auctions must cover the costs to federal users of either vacating or sharing the auctioned spectrum.

The Advanced Wireless Services -3 (AWS-3) auction resulted in vacating 25 MHz of the spectrum. The Range and programs were compensated for the costs to mitigate that loss by procuring capabilities that allowed them to transfer their activities to other portions of the spectrum. The current approach for the auctions leans heavily towards the sharing of the spectrum with commercial users.

Spectrum is a precious resource that is scheduled for use with nearly every test and training event. The increasing complexities of the weapons and platforms have resulted in an increased requirement for data. As the data transmission requires an RF spectrum on an open-air range such as the Sea Range, the loss of access to the RF spectrum is impacting the ability of the Range to provide the data needed to support good decisions. The current auction policies and procedures supported the investments in equipment needed to support the move of users to other portions of the spectrum. With sufficient initial investments, most mitigations were successful.

The current emphasis on sharing requires investments for increased monitoring and real-time deconfliction in the shared bands. The investments in the equipment and procedural changes are well addressed by the current auction policies. However, sharing also requires a longer-term investment in the personnel and resources to perform the functions of monitoring, scheduling, real-time deconfliction actions, and communications with commercial users. The auction funds are not currently structured to provide sustained workforce funding. When those funds are exhausted, the long-term costs of fulfilling the sharing agreements must be borne by the taxpayer via the normal Congressional budgeting process. This is counter to the original intent of the Plan.

We recommend that NTIA and the FCC remain cognizant of the long-term staffing and resources required to support the sharing of the RF Spectrum between Federal and commercial users during the development of a national strategy and to identify opportunities to allow longer-term sustainment of these activities utilizing auction funding.

Sincerely,
Gene Fisher



Co-Chairman RDP-21