

**Before the  
NATIONAL TELECOMMUNICATIONS AND INFORMATION ADMINISTRATION  
Washington, DC 20230**

In the Matter of )  
Implementation of a National Spectrum ) Docket No. 2023-0003  
Strategy )

**COMMENTS OF THE WIRELESS INNOVATION FORUM**

The Wireless Innovation Forum (WInnForum) submits these comments in response to the Request for Public Input issued by the Department of Commerce, National Telecommunications and Information Administration (NTIA) in the above-referenced proceeding.<sup>1</sup>

**I. INTRODUCTION**

The Wireless Innovation Forum (WInnForum) is a U.S. based international non-profit organization driving technology innovation in commercial, civil, and defense communications around the world. Forum members bring a broad base of experience in Software Defined Radio (SDR), Cognitive Radio (CR) and Dynamic Spectrum Access (DSA) technologies in diverse markets and at all levels of the wireless value chain to address emerging wireless communications requirements through enhanced value, reduced total life cost of ownership, and accelerated deployment of standardized families of products, technologies, and services.

The WInnForum advocates for technology and service neutrality across the band to enable innovative and efficient use of spectrum. The WInnForum believes that increased

---

<sup>1</sup> *Implementation of the National Spectrum Strategy, Notice of Opportunity for Public Input*, 88 Fed. Reg. 85,266 (December 7, 2023).

neutrality with respect to the specific uses of licensed spectrum results in increased innovation in wireless applications.

In addition, the WinnForum advocates allocating spectrum with licenses adapted towards a spectrum usage rights method that has the minimum necessary technical restrictions to provide adequate protection against harmful interference. Optimal use of radio spectrum is more likely to be secured if the market, and not the regulator, decides what technology or service should be provided in a particular frequency band. The increase in users' flexibility and ability to respond faster to changing market and deployment conditions will enhance the ability to increase spectrum usage efficiency. Licenses should not necessarily restrict the technology or application.

The WinnForum is pleased to submit these comments and looks forward to working with all stakeholders to develop the implementation plan for the National Spectrum Strategy.

## **II. COMMENTS**

The WinnForum notes the National Spectrum Strategy recognizes that making spectrum available for commercial and federal use will rely heavily on spectrum sharing. Indeed, NTIA says that, "...it will—within 12-18 months—complete a “moonshot” effort, in collaboration with industry, to advance research, create investment incentives, and set forth measurable goals for advancing the state of technology for spectrum access, with an emphasis on dynamic forms of spectrum sharing for all users.”<sup>2</sup>

This is absolutely congruent with the WinnForum efforts in the area of spectrum sharing.<sup>3</sup> The WinnForum advocates the unified active management of spectrum to maximize

---

<sup>2</sup> NSS at p 13.

<sup>3</sup> See *Wireless Innovation Forum Advocacy Agenda*, WINNF-RC-0007 Version V1.2.0, September 2021, [https://www.wirelessinnovation.org/assets/work\\_products/Recommendations/WINNF-RC-0007%20V1.2.0%20WINNF%20Advocacy%20Agenda.pdf](https://www.wirelessinnovation.org/assets/work_products/Recommendations/WINNF-RC-0007%20V1.2.0%20WINNF%20Advocacy%20Agenda.pdf), “The Forum advocates the use of dynamic, situational prioritization of network and spectrum resources to optimize communications to meet the mission needs.”

spectrum utilization. In 2015, the WINNForum created the Spectrum Sharing Committee (SSC) focused on implementing the FCC's regulations for three-tiered spectrum sharing in the CBRS band.<sup>4</sup> The SSC presently has broad participation from organizational stakeholders in the CBRS band, including wireless operators, SAS and ESC administrators, equipment manufacturers, satellite operators, Wireless Internet Service Providers (WISPs), utilities, Communications Research Centre Canada (CRC), MITRE, and others. The WINNForum collaborated through the SSC with federal agency stakeholders from the Institute for Telecommunication Sciences, the National Institute of Standards and Technology, the Defense Information Systems Agency, the DoD CIO, the Navy and other government agencies. All federal agency stakeholders had a strong role and participated heavily in the development of the SSC baseline standards. Ultimately, the FCC relied heavily on the WINNForum standards and recommendations for development and operation of the SAS. Our publicly available SSC baseline standards can be found here: <https://cbrs.wirelessinnovation.org/winnforum-cbrs-knowledge-base>.

In 2019, The WINNForum created the 6 GHz Committee focused on the study of sharing arrangements in spectrum designated for unlicensed operation within the 6 GHz band (5925-7125 MHz).<sup>5</sup> The committee provides technical input to inform the FCC's 6 GHz rulemaking and facilitates the interpretation and implementation of the rulemaking that allows industry and regulators to collaborate on implementation of a common, efficient and well-functioning 6 GHz ecosystem. The Committee has created five baseline standards for the AFC and numerous recommendations and reports. The full set of the Committee's work can be found at the following link: <https://6ghz.wirelessinnovation.org/work-group-products>

---

<sup>4</sup> See: [https://www.wirelessinnovation.org/assets/Press\\_Room/ssc%20announcement%20final.pdf](https://www.wirelessinnovation.org/assets/Press_Room/ssc%20announcement%20final.pdf)

<sup>5</sup> See: <https://www.businesswire.com/news/home/20190821005549/en/Wireless-Innovation-Forum-Announces-Approval-of-New-6-GHz-Multi-stakeholder-Committee>

Because the 6 GHz band is of great importance to the Wi-Fi community, the Wi-Fi Alliance also has a critical role in developing specifications for Wi-Fi devices and the interfaces to the AFC system. The WinnForum and Wi-Fi Alliance have collaborated closely on the respective development of specifications and have shared numerous documents through liaison statements.<sup>6</sup> We have also held several joint meetings with the FCC.

The WinnForum has substantial experience in developing technical and service neutral standards, recommendations and guidelines for implementing commercial spectrum sharing systems. We encourage NTIA to review our substantial work completed over the last decade to support spectrum sharing and we are eager to participate in the NTIA's moonshot effort to advance research, create investment incentives, and set forth measurable goals for advancing the state of technology for dynamic shared spectrum access for all stakeholders.

### **III. CONCLUSIONS**

The WinnForum welcomes the opportunity to comment on the implementation plan for the National Spectrum Strategy. We look forward to working with NTIA and all spectrum stakeholders.

Respectfully Submitted,

/s/ H. Mark Gibson

H. Mark Gibson  
President and Chair

The Wireless Innovation Forum  
11130 Sunrise Valley Drive., Suite 350  
Reston, VA 20191

Date: January 2, 2023

---

<sup>6</sup> See Joint WinnForum and WFA ex parte: <https://www.fcc.gov/ecfs/document/106221212215731/1>