



**BROADBAND
WITHOUT
BOUNDARIES**

200 Massachusetts Ave NW, Suite 700
Washington, DC 20001
(202) 240-7000
www.wispa.org

September 30, 2025

Marlene H. Dortch, Secretary
Federal Communications Commission
45 L Street, NE
Washington, DC 20554

Re: ***Promoting Investment in the 3550-3700 MHz band (GN Docket No. 17-258)***
Ex Parte Communication

Dear Ms. Dortch:

Last August, the Commission initiated a rulemaking proceeding to consider a number of targeted changes to the technical rules for the Citizens Broadband Radio Service (“CBRS”).¹ In its Comments² and Reply Comments,³ WISPA – *The Association for Broadband Without Boundaries* supported many of the Commission’s proposals, but strongly opposed two proposals proffered by other commenters. First, WISPA explained that increasing the maximum authorized power for Citizens Broadband Radio Devices would be extremely disruptive to incumbent operations, would threaten to increase harmful interference, would undermine investment in CBRS and, in general, would be “contrary to the Commission’s original principle in creating the CBRS band structure.”⁴ As leading CBRS manufacturer Cambium Networks explained, CBRS operators “would face the Hobson’s Choice of either operating with their existing lower-power equipment or buying the new, higher-power equipment well before the existing equipment reaches its expected end of life.”⁵

Second, WISPA opposed a suggestion to re-locate CBRS users to another band.⁶ WISPA stated that:

In the *NPRM*, the Commission unanimously found that “[s]ince the commencement of Citizens Broadband Radio Service operations in the 3.55-3.7 GHz band . . . nearly five years ago, we have seen ongoing growth and increasing

¹ *Promoting Investment in the 3550-3700 MHz band*, Notice of Proposed Rulemaking and Declaratory Ruling, GN Docket No. 17-258 (rel. Aug. 16, 2024) (“*NPRM*”).

² Comments of WISPA, GN Docket No. 17-258 (filed Nov. 6, 2024).

³ Reply Comments of WISPA, GN Docket No. 17-258 (filed Dec. 5, 2024) (“WISPA Reply Comments”).

⁴ WISPA Reply Comments at 4, quoting Comments of Tarana Wireless, GN Docket No. 17-258 (filed Nov. 6, 2024) at 18.

⁵ Comments of Cambium Networks, Ltd., GN Docket No. 17-258 (filed Nov. 6, 2024) at 4.

⁶ See WISPA Reply Comments at 17-22.



Marlene H. Dortch, Secretary
September 30, 2025
Page 2 of 4

diversity in deployments in the band.” The Commission explained that a “wide variety of new entrants—including mobile network operators, Wireless Internet Service Providers (WISPs), cable operators, utilities, private network operators, educational institutions, and others—have employed this ‘innovation band’ to provide next generation wireless services to users across the country, including many in rural and underserved areas.” The Commission provided a detailed overview of the state of the CBRS Band, stating that “[i]nterest in the Citizens Broadband Radio Service band has been strong from the outset.” The Commission also cited to numerous government and industry group reports confirming that CBRS deployments “have increased steadily in the more than four years since commercial service was first authorized in the band.”⁷

WISPA also cited an NTIA report showing “continued growth” and that “CBRS continues to successfully facilitate growth in wireless broadband devices and provide cost-effective wireless broadband access, especially in rural communities.”⁸

While the enactment of the One Big Beautiful Bill eliminates the possibility of auctioning of the 3.1-3.45 GHz band (and, presumably, relocation of non-Federal spectrum to that band), WISPA understands that the Commission is tasked with consulting with NTIA on identifying 800 megahertz of spectrum – 300 megahertz of which is not specifically confined to Federal spectrum – for high-power, licensed commercial operations.

That spectrum should not come from CBRS. It may seem attractive to cleave the upper 50 megahertz of spectrum, which is only used for General Authorized Access (“GAA”), from CBRS, but that also would be extremely destructive to existing users. The NTIA Report makes clear “that the GAA tier has been an increasingly popular supplement to PALs:”⁹

- “the percentage of active CBSDs with a PAL grant that were also using at least one GAA grant increased steadily to 82.2% on July 1, 2024.”¹⁰

⁷ *Id.* at 18 (citations omitted).

⁸ *Id.* at 19, *quoting* Douglas Boulware, Anthony Romaniello, An Analysis of Aggregate CBRS SAS Data from April 2021 to July 2024, NTIA Report 25-575 (November 2024), <https://www.ntia.gov/sites/default/files/reports/an-analysis-of-aggregate-cbrs-sas-data-from-april-2021-to-july-2024.pdf> (“NTIA Report”).

⁹ *Id.* at 7.

¹⁰ *Id.*



Marlene H. Dortch, Secretary
September 30, 2025
Page 3 of 4

- “Overall, 94.9% of the active CBSDs on July 1, 2024, had at least one GAA grant.”¹¹
- “GAA grants accounted for 82.3% of all CBSD grants on July 1, 2024.”¹²
- “On July 1, 2024, 82.7% of all counties in the United States used at least one channel of CBRS and 41% of all counties used all 15 channels.”¹³ This means that all eight GAA channels are being used in 41% of the counties in the United States.
- There is a higher percentage of grants on the GAA-only channels (3650-3700 MHz) than on the 100 megahertz of shared spectrum (3550-3650 MHz).¹⁴

GAA also will be an important tool for implementing BEAD projects. Although data from all states and territories is not available at this time, it is clear that fixed wireless spectrum – including GAA – will be a significant and low-cost technology to deploy. Roughly 11% of provisionally approved subawards will use fixed wireless technology, with Montana and Nebraska exceeding 50% of locations and Iowa and New Mexico exceeding 40% of locations. Notably, these are large rural states where the coverage and capacity benefits of CBRS can enable efficient deployment.

As the Commission and NTIA begin the process of identifying 800 megahertz of spectrum for higher-power licensed use, they should consider other spectrum bands that will be less disruptive to widely deployed operations in rural communities and the consumers who rely on GAA for broadband connectivity.

¹¹ *Id.*

¹² *Id.* at 9.

¹³ *Id.* at xi.

¹⁴ *Id.* at 14, Fig. 12. The outlier is 3690-3700 MHz, which is adjacent to the higher-power Lower C-band and suffers from higher out-of-band emission levels.



BROADBAND
WITHOUT
BOUNDARIES

Marlene H. Dortch, Secretary
September 30, 2025
Page 4 of 4

Pursuant to Section 1.1206 of the Commission's Rules, this letter is being filed via ECFS in the above-referenced docket. Please contact the undersigned with any questions.

Respectfully submitted,

/s/ Louis Peraertz

Louis Peraertz, Vice President of Policy

cc: Arpan Sura
Edyael Casaperalta
Will Holloway
Paul Powell
Jessica Greffenius
Nellie Foosaner
Kamran Etemad
Navid Golshani
Robert Pavlak
Dana Shaffer

Submit a Standard Filing

Proceeding(s):	17-258
Confirmation #:	202509301735603856
Submitted:	Sep 30, 2025 5:10:04 PM
Status:	RECEIVED
Name(s) of Filer(s)	WISPA – The Association for Broadband Without Boundaries
Law Firm(s)	
Attorney/Author/Submitter Name(s)	
Primary Contact Email	goshel@lermansenter.com
Type of Filing	LETTER
File Number	
Report Number	
Bureau ID Number	
Address of	Filer
Address	200 Massachusetts Ave NW, Suite 700, Washington, DC, 20001
Email Confirmation	Yes

SUBMIT ANOTHER C

For assistance with using ECFS, please contact the ECFS Help Desk at [202-418-0193](tel:202-418-0193) or via email at ECFSHelp@fcc.gov.

Federal Communications Commission
45 L Street NE
Washington, DC 20554

[Phone: 1-888-225-5322](tel:1-888-225-5322)
[ASL Video Call: 1-844-432-2275](tel:1-844-432-2275)
[Fax: 1-866-418-0232](tel:1-866-418-0232)

[Contact US](#)



[Website Policies & Notices](#)

[Privacy Policy](#)

[FOIA](#)

[No Fear Act Data](#)

[FCC Digital Strategy](#)

[Open Government Directive](#)

[Plain Writing Act](#)

[RSS Feeds & Email Updates](#)

[Accessibility](#)

[Vulnerability Disclosure Policy](#)

[USA.gov](#)

CATEGORIES

[About the FCC](#)

[Proceedings & Actions](#)

[Licensing & Databases](#)

[Reports & Research](#)

[News & Events](#)

[For Consumers](#)

BUREAUS & OFFICES

[Consumer](#)

[Enforcement](#)

[Inspector General](#)

[International](#)

[Media](#)

[Public Safety](#)

[Wireless](#)

[Wireline](#)

[Offices](#)