

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of)
)
Licensing and Coordination Procedures for the) ET Docket No. 13-115
Space Launch Service)

To: Wireless Telecommunications Bureau

**COMMENTS
OF THE
ENTERPRISE WIRELESS ALLIANCE**

The Enterprise Wireless Alliance (“EWA”) provides the following Comments on the Wireless Telecommunications Bureau (“WTB”) Public Notice seeking comment on the licensing and coordination procedures for the new commercial Space Launch Service.¹ The Public Notice was required pursuant to the statutorily mandated deadlines in the Launch Communications Act² in which Congress directed the Federal Communications Commission (“FCC”) to take various actions in support of the new commercial Space Launch Service (“Service”). In earlier phases of this proceeding, the FCC adopted secondary allocations for non-Federal Space Operations in the 2025-2110 MHz and the 2200-2290 MHz bands, subject to various conditions, and sought comment on adding the 2360-2395 MHz band to the Service.³ More recently, in its Third Report and Order, the FCC reallocated the 2360-2395 MHz band on a secondary basis for Space Operations and included the band in the existing Part 26 space launch regulatory framework.⁴

¹ *Wireless Telecommunications Bureau Seeks Comment on Licensing and Coordination Procedures for the Space Launch Service*, ET 13-115, DA 24-1232 (rel. Dec. 6, 2023) (“Public Notice”). The Public Notice was published in the Federal Register on Dec. 23, 2024.

² Launch Communications Act, Publ. L. No. 118-85, 138Stat. 1546 (“LCA”).

³ *Allocation of Spectrum for Non-Federal Space Launch Operations*, Second Report and Order and Second Further Notice of Proposed Rulemaking, ET Docket No. 13-115, 38 FCC Rcd 9029 (2023) (“2nd R&O” and “2nd FNPRM”).

⁴ *Allocation of Spectrum for Non-Federal Space Launch Operations*, Third Report and Order, ET Docket No. 13-115, FCC 24-132 (rel. Dec. 31, 2024) (“3rd R&O”).

The Public Notice, which was released prior to the 3rd R&O, indicates that the procedures adopted pursuant to the Public Notice will also apply to the 2360-2395 MHz band.⁵

EWA's interest in this matter is limited to the interrelationship between the coordination procedures applicable to the Service and EWA's responsibilities as the FCC-certified Frequency Coordinator for secondary Medical Body area Networks ("MBAN") operating in the 2360-2390 MHz band. EWA assumed this role pursuant to a Memorandum of Understanding ("MOU") with the FCC effective October 23, 2015. While MBAN is authorized to operate in the 2360-2400 MHz band, under the MOU EWA is responsible for providing a mechanism to ensure that MBAN devices do not cause interference to primary Aeronautical Mobile Telemetry ("AMT") operations utilizing 2360-2390 MHz spectrum. It is required to coordinate MBAN operations with the Aerospace and Flight Test Radio Coordinating Council, Inc. ("AFTRCC"), the designated AMT coordinator in the band. Formal coordination procedures have been established between EWA and AFTRCC to fulfill that coordination responsibility. Additionally, the FCC requires MBAN operations in the 2390-2400 MHz portion of the band to be registered with EWA.⁶

EWA now seeks guidance on the coordination relationship between space launch activities and MBAN operations, both of which are secondary to other users in the 2360-2395 MHz band. There was no reference to MBAN in the 2nd FNPRM. MBAN is recognized in the 3rd R&O, at least in footnotes, but without any explanation of how these two services are expected to co-exist. The 3rd R&O states the following:

We note that Medical Body Area Network devices operating under the secondary allocation for MedRadio services in the 2360–2400 MHz band must utilize a similar coordination process in order to avoid causing harmful interference to the primary operations in the band. *See* 47 CFR § 95.2509. In addition, MedRadio operations by rule must not cause harmful interference to, and must accept any

⁵ Public Notice at ¶ 10.

⁶ Multiple healthcare vendors have FCC equipment authorizations to operate MBAN in this portion of the band.

interference from, any authorized stations operating in the 2360–2400 MHz band, and MedRadio transmitters must have the ability to operate in the presence of primary and secondary users in the 2360–2400 MHz band. *Id.* § 95.2525.⁷

It also states:

We also note that the Commission utilized a similar approach when it authorized Medical Body Area Networks to operate in the 2360–2395 MHz band and adopted part 95 rules requiring the registration and coordination of those operations. *See generally Amendment of the Commission's Rules to Provide Spectrum for Operation of Medical Body Area Networks*, ET Docket No. 08-59, First Report and Order and Further Notice of Proposed Rulemaking, 27 FCC Rcd 6422, 6448–57, paras. 56–74 (2012); *see also* 47 CFR § 95.2509.⁸

Neither note specifies how space launch activities are expected to coordinate with and avoid causing interference to MBAN operations.⁹

EWA looks forward to clarification from the FCC on this point. If a further MOU detailing the coordination process between the Service and MBAN is required, EWA would be pleased to consider whatever arrangement the FCC proposes.

Respectfully submitted,

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⁷ 3rd R&O at n. 73 (emphasis added).

⁸ *Id.* at n. 193.

⁹ MBAN devices operate within buildings at medical facilities with power levels no greater than .012 watt of output power. At this power level, it is unlikely that MBAN devices will cause interference to launch operations. However, there may be interference from space operations to MBAN.

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