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

In the Matter of	)	
	)	
DELETE, DELETE, DELETE	)	GN Docket No. 25-133
	)	

To: The Commission

COMMENTS
OF THE
ENTERPRISE WIRELESS ALLIANCE

The Enterprise Wireless Alliance ("EWA") welcomes this Federal Communications Commission ("FCC") initiative to alleviate the unnecessary regulatory burdens identified below. EWA is also a member of the National Wireless Communications Council ("NWCC") and endorses the recommendations in its filing.

As with any body of rules developed over decades in response to evolving technologies and uses, there are provisions in the FCC rules that are no longer relevant and could be deleted. EWA's recommendations identify rules that impose an actual burden on applicants/licensees and on the FCC staff. The changes proposed would also promote sound spectrum management by allowing more channels to be placed into productive use in a timely fashion. These recommendations are already before the FCC in the identified proceedings.

- Part 90 Subpart S rules should be modified to eliminate the provision assigning frequencies within the 809-816/854-861 MHz band to specific "pools" of eligible entities, thereby requiring the applicant to obtain concurrence from the "out of pool" Frequency Advisory Committee ("FAC")

and then request a waiver to access vacant "out-of-pool" frequencies, which FCC staff must review. All frequencies within that band segment are subject to identical technical and operational rules and should be reclassified as belonging to the existing General Category pool and made available to all qualified applicants. The 800 MHz "rebanding" process effectively eliminated eligibility distinctions as incumbents routinely were assigned replacement channels from other than their eligibility pool. This hyper-classification of frequencies adopted more than forty (40) years ago continues to impose an unnecessary burden on potential licensees and FCC staff. (RM-11978)

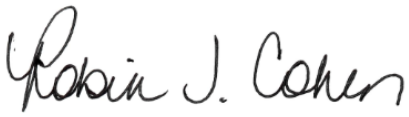
- FCC Rule Sections 90.35(b)(2)(iii) and 90.175(b) should be modified to delete the requirement for concurrence from FACs of frequencies previously shared by the services identified in those rules. The concurrence requirement was adopted decades ago and requires an applicant to obtain concurrence on certain frequencies from the FAC that previously had exclusive coordination rights for what were asserted to be "higher priority" users. It is a vestige of rules that subcategorized enterprise entities into more than a dozen different radio services. Those services were consolidated into the current Industrial/Business category and operate under identical technical and operational rules that provide appropriate protection from interference for all licensees. Retaining a concurrence requirement adds time to the

coordination and licensing process and also increases costs as there are fees assessed by the concurring FAC. (RM-11979)

EWA looks forward to working with the FCC on the rule deletions proposed herein and the matters recommended in the NWCC Comments to alleviate unnecessary regulatory burdens.

Respectfully submitted,

ENTERPRISE WIRELESS ALLIANCE



Robin J. Cohen
President/CEO
13221 Woodland Park Road, Suite 410
Herndon, VA 20171
(703) 528-5115
robin.cohen@enterprisewireless.org

April 11, 2025