

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

In the Matter of)
)
Facilitating Opportunities for Advanced Air) WT Docket No. 24-629
Mobility)

To: The Commission

**COMMENTS
OF THE
ENTERPRISE WIRELESS ALLIANCE**

The Enterprise Wireless Alliance (“EWA”) is pleased to provide its comments on the portion of the above-identified proceeding relating to air-ground communications in the 450 MHz band.¹ The NPRM proposes to “replace the current rigid framework with rules that embrace more flexible use of the band.”²

Had the Federal Communications Commission (“FCC”) not already proposed the rule changes in this NPRM, many would have been ideal candidates for the FCC’s ambitious Delete, Delete, Delete proceeding.³ As explained in the Petition for Rulemaking filed by AURA Network Systems OpCo, LLC in 2021,⁴ many of the rules at issue are vestiges of a much earlier time in the telecommunications industry and “stand in the way of deployment, expansion, competition, and technological innovation.”⁵ EWA filed in support of the AURA Petition and in response to AURA’s earlier Request for Waiver of many of these same rules.⁶ EWA noted that

¹ *Facilitating Opportunities for Advanced Air Mobility*, Notice of Proposed Rulemaking, WT Docket No. 24-629 (FCC 25-7) (rel. Jan. 17, 2025) (“NPRM”).

² *Id.* at ¶ 3.

³ *Delete, Delete, Delete*, Public Notice, GN Docket No. 25-133, DA 25-219 (rel. Mar 12, 2025) (“D3 PN”).

⁴ Petition of A2G Communications, LLC and AURA Network Systems OpCo, LLC, WT Docket No. 20-185 (filed Feb. 16, 2021) (“AURA Petition”). The AURA petitioner/licensee entity is a wholly-owned subsidiary of AURA Network Systems, Inc (“AURA”).

⁵ D3 PN at 1.

⁶ EWA Comments, RM-11912, filed Sept. 24, 2021.

the Waiver Request was endorsed by a range of industrial and governmental entities, all of which expressed a growing need for the type of UAS operations AURA proposed to support on this UHF spectrum. The FCC is entirely correct that Advanced Air Mobility (“AAM”), of which AURA’s network is one element, is expanding rapidly and will rely increasingly on automated technologies used in UAS or in conjunction with crewed aircraft. The entities that increasingly rely on AAM to deliver passengers and cargo, to transport medical personnel and supplies, to improve visibility into critical infrastructure facilities more quickly and safely than through in-person visits, and that are developing applications in anticipation of a robust AAM environment appreciate the FCC’s desire to adopt rules that are consistent with modernized AAM operations.

Consistent with that objective, EWA endorses the following rule changes for AAM service in the 450 MHz band:

- Consistent with the AM(R)S allocations generally and with the objective of promoting maximum flexibility, EWA recommends that this allocation should not be limited to CNPC services or even to uncrewed service. Technology and applications are evolving so quickly in this space that prescriptive rules other than those ensuring non-interference should be avoided whenever possible.
- The FCC should approve a transition from AURA’s site-based licenses across the country to a nationwide license. As noted in the NPRM, AURA holds the only licenses in this band and has met the buildout obligations associated with those authorizations. There is no white space where a third party could secure a license. Under those circumstances, retaining a site-based licensing system is highly inefficient for AURA and for the FCC. Issuing a nationwide license would, as the FCC says, ensure “that spectrum is put to highest use because the incumbent is in

the best position to rapidly deploy operations,”⁷ and “is in the public interest because of the public safety need for UAS CNPC across the country.”⁸

- EWA agrees with the FCC’s tentative conclusion that this voluntary transition will not create undo enrichment for AURA.⁹ The FCC has made clear its desire to promote entrepreneurial innovations in spectrum, particularly when doing so promises to deliver services for which there is identified demand and a public interest benefit. AURA is developing what many would have considered an improbably small amount of historically underutilized spectrum - 650 kHz in a world where 10, 20 and even 50 MHz allocations are not uncommon - into a band that will support a variety of AAM services. Doing so has required and will continue to require a significant investment on its part. The historical, unique site/frequency-specific licensing process and associated fees have required AURA and its predecessor company to make significant payments for the use of this 650 kHz of spectrum already. Requiring a payment to the U.S. Treasury based on some theoretical increase in the value of the spectrum, a value attributable to AURA’s own efforts, is not appropriate in this situation.
- EWA supports performance requirements for all spectrum to ensure that it is placed into productive use. Its only comment relative to this band is to ensure that the requirements are tailored to the practical/technical realities of a 650 kHz bandwidth license, which may not be able to achieve ubiquitous nationwide low- and high-altitude coverage. EWA is confident the FCC’s technical experts with

⁷ NPRM at ¶ 15.

⁸ *Id.* at ¶ 16.

⁹ *Id.* at ¶ 22.

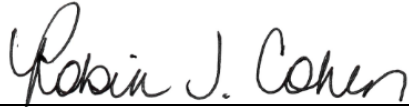
input from AURA will arrive at a standard that ensures productive nationwide use of the spectrum with operational flexibility for AAM purposes.

- The FCC's proposal to eliminate the channel siting requirements in Rule Sections 22.813 and 22.817 is entirely correct. Those rules reflect technical and operational criteria that have no practical purpose today given AURA's position in the band and would have no relevance in a nationwide geographic licensing framework.

A number of EWA members have expressed an increasingly urgent need for UAS operations to meet industrial requirements, in particular those relating to employee safety and operational efficiencies. EWA recognizes that some of the issues raised in this proceeding are complex from a regulatory and technical perspective. The rule modifications proposed for the Part 22 UHF spectrum on which AURA already operates pursuant to waiver are straight-forward and non-controversial. A Report and Order addressing this aspect of the NPRM could and should be adopted promptly in a separate action if other matters in the proceeding require lengthier deliberation.

Respectfully submitted,

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