

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

In the Matter of )  
 )  
Protecting our Communications Networks by ) GN Docket No. 25-166  
Promoting Transparency Regarding Foreign )  
Adversary Control )  
To: The Commission

**COMMENTS  
OF THE  
NATIONAL WIRELESS COMMUNICATIONS COUNCIL**

The National Wireless Communications Council (“NWCC”) respectfully submits these comments in response to the Notice of Proposed Rulemaking (“NPRM”) adopted by the Federal Communications Commission (“FCC” or “Commission”).<sup>1</sup> The NPRM seeks comment on proposed certification and information collections intended to further the FCC’s understanding of threats from foreign adversaries.<sup>2</sup> This proposal builds on recent FCC actions in this area, such as its Covered List addressing equipment deemed to pose an unacceptable risk to national security<sup>3</sup> and its Evolving Risks Order in which it collected information about foreign ownership, including foreign adversary ownership, for all international section 214 authorization holders.<sup>4</sup>

The NWCC is a non-profit association of organizations representing virtually all licensees and lessees operating under authorizations granted pursuant to part 90, as well as many entities operating pursuant to part 22, part 80, part 87, part 95, part 96, and part 101 authorizations,

---

<sup>1</sup> *Protecting our Communications Networks by Promoting Transparency Regarding Foreign Adversary Control*, GN Docket No. 25-166, Notice of Proposed Rulemaking, FCC 25-29 (rel. May 27, 2025).

<sup>2</sup> The FCC proposes to define foreign adversaries as China, Russia, Iran, North Korea, Cuba, and the Maduro Regime in Venezuela, consistent with designations by the Executive Branch.

<sup>3</sup> See *Protecting Against National Security Threats to the Communications Supply Chain Through the Equipment Authorization Program*, ET Docket No. 21-232, Report and Order, Order, and Further Notice of Proposed Rulemaking, 37 FCC Rcd 13493.

<sup>4</sup> See *Review of International Section 214 Authorizations to Assess Evolving National Security, Law Enforcement, Foreign Policy, and Trade Policy Risks et al.*, IB Docket No. 23-119 et al., Order and Notice of Proposed Rulemaking, 38 FCC Rcd 4346 (2023).

manufacturers of land mobile radio equipment, and all part 90 frequency coordinators, designated as Frequency Advisory Committees (“FACs”).<sup>5</sup> The great majority of licensees and lessees represented operate internal systems, both Public Safety (“PS”) and Industrial/Business (“I/B”), that provide closed-loop communications within the authorized organization classified by the FCC as having “private, internal” regulatory status. A small number of licensees provide non-interconnected service to other eligible entities, which is classified by the Communications Act as Private Mobile Radio Service (“PMRS”) and as having non-common carrier regulatory status by the FCC. That service is also limited to employees or agents of the entity being served.

The NWCC supports the FCC’s efforts to identify any Regulatee, as defined in Part III.A.2 of the NPRM, that is owned by, controlled by, or subject to the jurisdiction or direction of a foreign adversary. The nation’s communications networks must be protected from such foreign threats. If the FCC determines to require certifications from all Regulatees, the NWCC FACs will file as required and will work with their members to promote compliance. The FCC suggests that compliance will be greater if certification becomes part of the routine licensing process by inclusion in Forms 601, 603, and 608, or by updating the Regulatee’s Commission Registration Systems (“CORES”) information.<sup>6</sup>

---

<sup>5</sup> NWCC membership includes the following organizations: American Association of State Highway and Transportation Officials (“AASHTO”); American Automobile Association (“AAA”); American Petroleum Institute (“API”); Association of American Railroads (“AAR”); Association of Public-Safety Communications Officials-International, Inc. (“APCO”); Aviation Spectrum Resources, Inc. (“ASRI”); Enterprise Wireless Alliance (“EWA”); Forest Industries Telecommunications (“FIT”); Forestry-Conservation Communications Association (“FCCA”); Government Wireless Technology & Communications Association (“GWTCA”); International Association of Fire Chiefs (“IAFC”); International Municipal Signal Association (“IMSA”); MRFAC, Inc. (“MRFAC”); Telecommunications Industry Association (“TIA”); The Monitoring Association (“TMA”); Utilities Technology Council (“UTC”); and Wireless Infrastructure Association (“WIA”). APCO opposes this NWCC filing.

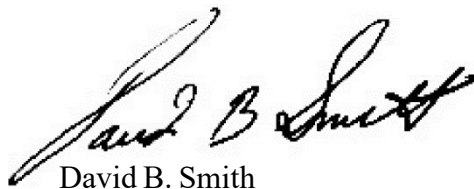
<sup>6</sup> The NWCC cautions, however, that requiring all Regulatees to update their CORES information within a limited period would place even further demands on the Universal Licensing System that already struggles to allow access on a timely basis.

However, the NWCC suggests that requiring certifications from private and non-common carrier licensees authorized under the parts of the FCC rules referenced above may be unduly burdensome for the FCC, whose staff will need to review each such certification. There are several hundred thousand such licensees, including a large number of PS entities, and the communications networks they operate are internal to their own organizations. It is improbable that a foreign adversary would have reason to attempt to control or direct such systems in an effort to compromise our national security and even less probable that a PS entity or critical infrastructure or other I/B licensee would knowingly accede to involvement by a foreign adversary and, therefore, be able to certify as to that relationship.

The NWCC recognizes the critical importance of maintaining the security of the nation's communications networks. For the reasons noted above, the NWCC does not believe certifications need to be required from private or non-common carrier wireless entities, but the NWCC will support whatever requirements and processes the FCC adopts.

Respectfully submitted,

**NATIONAL WIRELESS  
COMMUNICATIONS COUNCIL**

A handwritten signature in black ink, appearing to read "David B. Smith", is written over a light blue horizontal line.

David B. Smith  
President  
13221 Woodland Park Road, Suite 410  
Herndon, Virginia 20171

July 21, 2025