

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

In the Matter of	)	
	)	
Ensuring Reliable Access to Spectrum for	)	ET Docket No. 13-115
Space Launch Activities	)	RM-12025

To: Chiefs, Wireless Telecommunications Bureau,
Office of Engineering and Technology, and Space Bureau

**COMMENTS
OF THE
ENTERPRISE WIRELESS ALLIANCE**

The Federal Communication Commission (“FCC”), through the above-identified Bureaus, has released a Public Notice (“PN”) seeking comment on actions the FCC might take to ensure the availability of abundant spectrum for space launch and reentry operations, consistent with Administration priorities.¹ The PN explains that the 2024 Launch Communications Act directed the FCC to add secondary allocations for these operations in the 2025-2110 MHz, 2200-2290 MHz, and 2360-2395 MHz bands.² The FCC did so while noting then and in the PN the complexity of those bands that also support a variety of primary services.³

¹ *WTB, OET, and SB Seek Comment on Ensuring Reliable Access to Spectrum for Space Launch Activities to Achieve the Goals of the President’s National Space Transportation Policy*, Public Notice, ET Docket No. 13-115, DA 26-887 (rel. Aug. 25, 2026) (“PN”).

² *See generally* Launch Communications Act, Pub. L. No. 118-85, 138 Stat. 1546 (2024).

³ *See* Allocation of Spectrum for Non-Federal Space Launch Operations; Amendment of Part 2 of The Commission’s Rules for Federal Earth Stations Communicating with Non-Federal Fixed Satellite Service Space Stations; Federal Space Station Use of the 399.9 400.05 MHz Band, ET Docket No. 13-115, Second Report and Order and Second Further Notice of Proposed Rulemaking, 38 FCC Rcd 9029 (2023); Allocation of Spectrum for Non-Federal Space Launch Operations, ET Docket No. 13-115, Third Report and Order, 39 FCC Rcd 14065 (2024). The PN noted there are a few select channels in the 2360–2395 MHz band for primary use of space launch and reentry activities.

The Enterprise Wireless Alliance (“EWA”) recognizes the challenges in addressing the expanding space launch and reentry spectrum requirements as the cadence of launches continues to accelerate. It also appreciates the need for an efficient, minimally burdensome coordination process among these variety of services, particularly those that operate with necessarily fluid schedules such as space operations, but one that provides appropriate protection for all entities sharing the band.

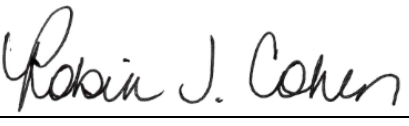
In crafting rules governing coordination among these various services, EWA wishes to remind the FCC that the 2360-2395 MHz band is also shared with the secondary Medical Body Area Networks (“MBAN”) service, another technically advanced, American evolution in hospital patient management.⁴ The FCC entered into a Memorandum of Understanding (“MOU”) with EWA in 2015 under which EWA is responsible for coordinating MBAN operations in the 2360-2390 MHz portion of the allocation with the primary Aeronautical Mobile Telemetry (“AMT”) service through the Aerospace and Flight Test Radio Coordinating Council (“AFTRCC”) that coordinates AMT operations in the band. EWA and AFTRCC have entered into an agreement consistent with the requirements of the MOU. It is EWA’s understanding that discussions have also been held regarding coordination of MBAN with space launch activities, both of which are secondary to primary AMT operations.

⁴ The MBAN allocation is for the 2360-2400 MHz band.

EWA supports the Administration's commitment to strengthening U.S. space transportation capabilities. It is confident those objectives can be met while continuing to recognize and provide appropriate provisions for continued deployment of MBAN technology in medical facilities around the nation.

Respectfully submitted,

ENTERPRISE WIRELESS ALLIANCE

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