

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

In the Matter of)
)
Facilitating Access to Spectrum for) **WT Docket No. 22-204**
Offshore Uses and Operations)

To: The Commission

**COMMENTS
OF THE
ENTERPRISE WIRELESS ALLIANCE**

The Enterprise Wireless Alliance (“EWA”), in accordance with Section 1.415 of the Federal Communications Commission (“FCC” or “Commission”) rules, respectfully submits its Comments in the above-entitled proceeding.¹ The FCC is requesting information about use cases that do, or in the future might, require spectrum offshore, what bands might be appropriate for such operations, and the mechanisms appropriate for issuing offshore licenses. As the organization representing the spectrum interests of a broad range of industrial entities, including those with identified and expanding offshore interests, EWA urges the Commission to proceed promptly in adopting a Notice of Proposed Rulemaking consistent with the record developed in response to this NOI.

As explained in the NOI, the FCC has addressed offshore spectrum requirements in the past through the issuance of site-based authorizations in response to individual, particularized needs. It notes most such licenses have been granted for fixed microwave authorizations or for site- and frequency-based facilities operated by entities eligible for Industrial/Business Pool

¹ *Facilitating Access to Spectrum for Offshore Uses and Operations*, WT Docket No. 22-204, Notice of Inquiry, 87 FR 38048 (2022) (“NOI”).

spectrum.² EWA supports this FCC policy, which has provided EWA members engaged in oil and gas exploration and drilling with communications capability essential to highly hazardous activities where safety must be the highest priority. More recently, EWA has heard from electric utility members and from the businesses that support them about the rapidly escalating demand for communications related to the construction and day-to-day activities of offshore windfarms. These user communities would benefit from Commission action clarifying the rules under which site- and frequency-based facilities will continue to be authorized, the distance from land at which licenses can be granted and, importantly, how they will be able to secure the benefits of geographically licensed broadband technology at offshore facilities.

While EWA cannot speak to the requirements of other categories of potential offshore usage, the complex and often hazardous activities in which its industrial members are engaged are best suited for exclusive licensing models. There is too great a potential for interference in a license-by-rule or “licensed light” model to satisfy their operational and oftentimes legally mandated responsibilities. They must have the ability to own or lease spectrum that can deliver the high degree of reliability and resiliency required for work that has only the very smallest tolerance for error.

For that reason, one critical issue will be the need to manage potential interference between land-based and offshore operations. This is vital even for site-based licenses but even more so with geographic authorizations where frequencies and sites can be moved within the defined area. The issue is not new. It typically is managed through out-of-band emission limits to protect operations on adjacent spectrum and defined power limits at the borders of geographically licensed co-channel systems. The greater propagation of wireless transmissions over water suggests that the offshore licensing model, whenever possible, should extend the

² NOI at 3; *see also* n. 4.

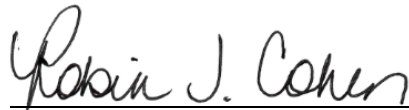
land-based authorization of coastal licensees to include offshore facilities, thereby relying on intra-system interference management to handle this issue.

Geographic licensing and broadband technology are a potent combination. They provide users with advanced capabilities as well as maximum flexibility to address coverage and capacity requirements as they arise without an ongoing need for governmental oversight. EWA strongly supports the availability of such licenses for its industrial members, in addition to site- and frequency-based authorizations when they satisfy the requirements of those users.

EWA is pleased the FCC has undertaken this initiative in recognition that the interest in offshore operations, and the need for communications to support them, will continue to grow. EWA expects to work with its members and the FCC in crafting rules consistent with the need to address this expanding requirement.

Respectfully submitted,

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