



April 17, 2023

National Telecommunications and Information Administration  
Department of Commerce  
Docket No. NTIA-2023-0003

**Re: Comments of Airlines for America to NTIA's Request for Comments on Development of a National Spectrum Strategy (NTIA-2023-0003)**

Airlines for America ("A4A"), on behalf of its members,<sup>1</sup> appreciates the opportunity to comment on the National Telecommunications and Information Administration's ("NTIA") request for comments, *Development of a National Spectrum Strategy* (hereinafter "NTIA RFC").<sup>2</sup> We support the establishment of clear guidelines for allocation of radiofrequency spectrum that facilitates the public good through the expansion of communications technology and the recognition and preservation of aviation safety, community access, and critical radiofrequency operations that support aviation communications and other instrumentation.

A4A is in full agreement with comments submitted by Aviation Spectrum Resources, Inc. (ASRI), in its separate filing. In particular, ASRI states, "... the essential element of a successful Spectrum Strategy for the United States will be band-specific government and private sector multi-stakeholder processes marked by early sharing of information to facilitate planning, which in turn promotes outcomes that build trust with incumbent operators and minimizes disruption of their services."

We need only look at the recent history of 5G telecommunications in the C-Band as a never-to-be-repeated example of the damage and confusion that a lack of "early information sharing" can cause and might have been avoided through intentional collaboration between all stakeholders much earlier in the process.

Further, when it comes to proposed spectrum decisions that might affect aviation systems, whether Federal or non-Federal or shared spectrum and whether changes in a band adjacent to or near aviation systems are at issue, it is essential that the Federal Aviation Administration and the Federal Communications Commission are both actively involved from the outset at both the highest and the working levels. We have seen, based on the 5G event, that a lack of mutual understanding of business realities and goals played a significant factor in a series of moving deadlines, learning "on-the-fly," and eventually expensive and frustrating avionics modifications that might have been mitigated by enhanced understandings. To the last

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<sup>1</sup> A4A's members are Alaska Air Group, Inc.; American Airlines Group, Inc.; Atlas Air Worldwide Holdings, Inc.; Delta Air Lines, Inc.; FedEx Corp.; Hawaiian Airlines; JetBlue Airways Corp.; Southwest Airlines Co.; United Airlines Holdings, Inc.; and United Parcel Service Co. Air Canada is an associate member.

<sup>2</sup> 88 Fed. Reg. 16,244 (Mar. 16, 2023).

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point, we believe that mitigation cost considerations for affected stakeholders should be a required component of the spectrum auction process.

We thank the NTIA for considering our comments and look forward to continuing to work with all parties to assure safe, reliable coexistence of commercial communications and aviation industry imperatives.

Respectfully submitted,

A handwritten signature in black ink that reads "Robert Ireland". The signature is written in a cursive style with a horizontal line underneath it.

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Robert Ireland  
Vice President, Safety, Maintenance and Engineering  
AIRLINES FOR AMERICA