



Wireless
Infrastructure
Association

August 21, 2025

VIA ELECTRONIC FILING

Marlene H. Dortch
Secretary
Federal Communications Commission
45 L Street NE
Washington, DC 20554

**Re: *Review of the Commission's Rules Governing the 896-901/935-940 MHz Band,*
WT Docket No. 24-99**

Dear Ms. Dortch:

The Wireless Infrastructure Association ("WIA"),¹ submits this letter to encourage the Commission to proceed with its proposal in this proceeding to allow further wireless applications in a 5/5 MHz channel in this band.² The record established in this proceeding shows overwhelming support for the proposal, which will enable innovative applications of wireless spectrum for critical industries including utilities and business enterprise needs.³ This proposal is particularly timely as the nation looks at ways to improve the reliability and capacity of utility networks to power revolutions in AI technologies—and is further consistent with Chairman Carr's Build America Agenda.⁴ Allowing enterprises to utilize the full 10 MHz channel in these frequencies will encourage the optimized use of this spectrum and will expand the reach of these

¹ The Wireless Infrastructure Association ("WIA") is the principal organization representing companies that build, design, own, and manage telecommunications facilities throughout the world. WIA's members include infrastructure providers, carriers, and professional services firms.

² *Review of the Commission's Rules Governing the 896–901/935–940 MHz Band*, Notice of Proposed Rulemaking and Order, WT Docket No. 24-99 (rel. Jan 16, 2025) [900 MHz NPRM].

³ See, e.g., Comments of Anterix, WT Docket No. 24-99; Comments of Ameren, WT Docket No. 24-99; Comments of San Diego Gas & Electric Company, WT Docket No. 24-99; Comments of Ericsson, WT Docket No. 24-99; Comments of Enterprise Wireless Association, WT Docket No. 24-99; Comments of the Lower Colorado River Authority, WT Docket No. 24-99; Comments of National Rural Electric Cooperative Association, WT Docket No. 24-99; Comments of the Utility Broadband Alliance, WT Docket No. 24-99. See also Petition for Rulemaking of Ameren Services Company, et al., RM-11977 (filed Feb. 28, 2024) (representing 10 companies urging the Commission to allow deployments in the full 10 MHz of spectrum) [900 MHz Petition].

⁴ See Remarks of FCC Chairman Brendan Carr, *A Build Agenda for America* (July 2, 2025), <https://docs.fcc.gov/public/attachments/DOC-412663A1.pdf> (discussing how unleashing spectrum capabilities and encouraging infrastructure deployment will spur the American economy).

applications while attracting additional investments and encouraging new and innovative wireless solutions.

As provided in the Petition initiating this proceeding, and supported by numerous commenters in the record, the Commission's decision to authorize the 3/3 MHz segment of this band has been a boon for enterprise and utility-focused private broadband networks.⁵ Since this rule change in 2020 utilities across the country have deployed solutions in this band including wildfire prevention, enhanced cybersecurity protections, and integration of distributed energy resources.⁶ However, as the breadth and utilization of these tools expands, additional wireless resources are necessary to support their implementation. The Commission recognized this need when it released the NPRM—now it is time to finish the job.

The Commission has received substantial comments from utility providers and the organizations that represent them which support adopting rules consistent with the NPRM.⁷ This commonsense proposal builds off the changes already implemented by the Commission and would give these critical users greater opportunity to utilize wide-area broadband networks that deliver connectivity with the requisite speed, reliability, and security needed for their specific enterprises.⁸ Further, by applying the existing rules to the remainder of the channel, the Commission will ensure that enhanced usage of this spectrum happens quickly and with minimum disruption to incumbents and adjacent users.⁹ The proven success of existing applications in this band, along with support from the core users, should counsel the Commission to move quickly in adopting the proposed rules.

By allowing more intensive use of the band for private wireless broadband, the Commission will not only support critical infrastructure that powers American homes and businesses but is also of increasing importance as the nation faces a new technological race in the adoption of AI. Ensuring an energy grid that can reliably and sufficiently deliver power to all Americans is a fundamental steppingstone in the race to AI dominance. However, building to

⁵ 900 MHz NPRM at para. 15 (“The establishment of the 3/3 broadband segment thus triggered an industry-driven response that allowed 900 MHz band users to recogniz[e] the now essential role broadband technology plays in all segments of the economy.” (internal quotes omitted)).

⁶ Comments of the Utility Broadband Alliance at 3-4.

⁷ See Comments of Anterix at 5-8 (providing examples of applications utilities are deploying and considering in this band).

⁸ 900 MHz Petition.

⁹ Comments of Anterix at 5 (“Band clearing can be completed in a reasonable amount of time based on mutually agreeable, negotiated terms.”).

meet this moment will require the Commission to adopt rules, like those proposed in this proceeding, to enable more spectrum and infrastructure to be deployed across the country as telecommunications, including private wireless solutions, are critical to ensuring that reliability and capacity.¹⁰

WIA encourages the Commission to adopt the proposed rules and expand the deployment of private broadband networks in this band. Innovative solutions that enhance utility performance, reliability, and security have already been implemented in this band and will become more ubiquitous and effective if provided the additional bandwidth requested. Further, adopting the proposed rule to expand operations in this band will spur new investments that will support deploying new infrastructure and create new opportunities for the wireless workforce. Simply put, good spectrum policy can also be good economic policy and the promises of enhanced usage of the 900 MHz band satisfies both.

Respectfully submitted,

/s/ Stephen Keegan

Stephen Keegan

Sr. Counsel, Government & Legal Affairs

WIA – The Wireless Infrastructure Association

2111 Wilson Blvd., Suite 210

Arlington, VA 22201

703.739.0300

¹⁰ See Comments of Anterix at 1-2. See also *Empowering Tomorrow's Grid: The Vital Role of Telecommunications in Enabling Decarbonization, Electrification, and Resilience*, EPRI (Feb. 26, 2024), <https://www.epri.com/research/products/000000003002029141>.