

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

In the Matter of)
)
Facilitating Opportunities for Advanced Air) WT Docket No. 24-629
Mobility)

To: The Commission

**COMMENTS
OF THE
NATIONAL WIRELESS COMMUNICATIONS COUNCIL**

The National Wireless Communications Council (“NWCC”) respectfully submits these comments in support of the Federal Communications Commission’s (“FCC’s” or “Commission’s”) recent Notice of Proposed Rulemaking (“*NPRM*”) seeking comment on modernizing the Commission’s rules governing the 454.6625-454.9875 MHz and 459.6625-459.9875 MHz spectrum band (“450 MHz band”) to facilitate the deployment of Advanced Air Mobility (“AAM”) and uncrewed aircraft service (“UAS”) operations.¹

The NWCC is a non-profit association of organizations representing virtually all users of land mobile radio systems, providers of land mobile services, and manufacturers of land mobile radio equipment. It acts on behalf of the vast majority of public safety, business, industrial, transportation, and private commercial radio users, as well as a diverse group of land mobile service providers and equipment manufacturers.² UAS applications serve important functions for

¹ *Facilitating Opportunities for Advanced Air Mobility et al.*, WT Docket No. 24-629 et al., Notice of Proposed Rulemaking, FCC 25-7 ¶ 10 (rel. Jan. 17, 2025) (“*NPRM*”).

² 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

NWCC members from inspection of critical infrastructure to aerial mapping and surveillance to emerging regional cargo and urban air mobility operations.³ UAS technology allows utility companies to quickly monitor and inspect their facilities while keeping personnel safe, especially if the facility is damaged after a natural disaster.⁴ Further, UAS applications support emergency response operations, such as search and rescue, air medical, and post-hurricane and wildfire response.⁵ UAS can also offer time and cost savings benefits for NWCC members by allowing them to collect information more easily, with greater accuracy, and with less risk to personnel.⁶

For these reasons, the NWCC is pleased to support the *NPRM's* proposals to modernize the 450 MHz band. A safe and reliable network is critical for the growth of UAS and realization of its benefits.⁷ AURA, the presumptive 450 MHz nationwide licensee, has invested heavily in the deployment of a modernized network that can meet demand for UAS communications across

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”).

³ See Comments of Utilities Technology Council et al., RM-1192, at 2 (filed Sept. 24, 2021).

⁴ See Comments of Edison Electric Institute, RM-1192, at 2-4 (filed Sept. 24, 2021) (“EEI Comments”).

⁵ See Comments of the National Public Safety Telecommunications Council, RM-1192, at 2 (filed Sept. 24, 2021).

⁶ See Comments of the Enterprise Wireless Association, RM-1192, at 2 (filed Sept. 24, 2021) (“EWA Comments”).

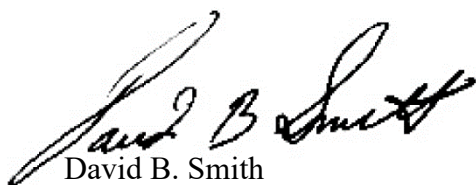
⁷ *NPRM* ¶ 1 (“The continued growth and operation of these important aviation technologies will depend on the availability of reliable wireless communications technologies to support flight control and, for AAM transporting passengers, reliable in-aircraft broadband.”); see also EEI Comments at 6 (“[G]iven the operational footprints of electric companies and their need for secure and reliable communications, it is a significant benefit that the band can be used to securely offer UAS [control and non-payload communications] services on a specialized, private carrier and on a nationwide basis to reduce the likelihood of network security issues and harmful interference.”).

the country, a “significant improvement” over the legacy service in the band.⁸ The proposed rules facilitating a flexible, nationwide network would serve the diverse needs of NWCC members, enable additional investment, and permit the deployment of up-to-date technology that supports modernized uses of the band while protecting other services and users.⁹ As EWA previously stated: “The adoption of more flexible rules in other services has been instrumental in the introduction of highly efficient, digital technologies that support more intensive use of the total bandwidth. That same flexibility should be authorized in this band.”¹⁰

The NWCC thanks the Commission for its efforts to facilitate increased development and deployment of AAM and UAS. Updating the 450 MHz band service rules will “remove unnecessary technological restraints and allow for more robust use of the spectrum.”¹¹ The NWCC encourages the Commission to promptly take the next step in ensuring reliable communications networks to support AAM and UAS.

Respectfully submitted,

**NATIONAL WIRELESS
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⁸ See EWA Comments at 2.

⁹ See *id.* at 2-3.

¹⁰ *Id.* at 4.

¹¹ *NPRM* ¶ 13.