

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

In the Matter of)	
)	
Upper C-band (3.98-4.2 GHz))	GN Docket No. 25-59

To: The Commission

**COMMENTS OF
NATIONAL PUBLIC RADIO, INC.**

Pursuant to Section 1.415 of the Commission’s Rules, 47 C.F.R. § 1.415, National Public Radio, Inc. (“NPR”) hereby submits Comments in response to the above-captioned Notice of Proposed Rulemaking (“NPRM”) in which the Commission seeks comment on expanding the ecosystem for next generation wireless services in the 3.7–4.2 GHz band (“C-band”) by making as much as 180, and at least 100, megahertz of the 3.98–4.2 GHz band (“Upper C-band”) available for terrestrial wireless flexible use via a system of competitive bidding.¹ NPR supports the Commission’s efforts to satisfy the congressional mandate to make mid-band spectrum available for terrestrial wireless services and restore U.S. leadership in wireless. In doing so, however, the Commission should not overlook incumbent users of the Upper C-band. Specifically, the Commission should recognize the role of the Upper C-band as an important distribution tool for broadcasters, including public radio stations. Public radio stations utilize the Upper C-band to receive satellite feeds necessary to provide important public services to their communities, including life-saving public safety and emergency alerting and noncommercial educational news, information and cultural programming. The Commission should ensure that a sufficient range of

¹ *Upper C-band (3.98-4.2 GHz)*, Notice of Proposed Rulemaking, GN Docket No. 25-59, FCC 25-78 (Nov. 21, 2025) (the “Notice”).

the Upper C-band remains available for incumbent users, like earth station operators including public radio stations, with adequate protection to ensure their usage of the Upper C-band is unaffected by interference. If ensuring incumbent users' usage of the Upper C-band without any interference is impossible or impractical, the Commission should ensure that reimbursement options for incumbent earth station operators affected by the repurpose of the Upper C-band cover costs of relocating to another equivalent option to make the incumbent users whole. The Commission should also ensure that all affected earth station operators are eligible for the reimbursement options by defining eligibility broadly. Continued interference-free use of the Upper C-band or sufficient reimbursement for relocating and past expenses and investments are essential for ensuring that noncommercial public radio stations remain able to provide their communities with vital information and emergency alerting services.

I. SUFFICIENT UPPER C-BAND SHOULD REMAIN AVAILABLE TO INCUMBENT USERS

Broadcasters utilize the Upper C-band to quickly and simultaneously distribute TV, radio, and other programming from central points to local stations, affiliates, and subscribers. The Upper C-Band, and the satellites on it, are especially beneficial for reaching more rural areas, where broadband is less available, and parts of North America, including Hawaii and Alaska, that are not as clearly reached by other parts of spectrum. Like other broadcasters, public radio stations utilize the C-Band as a critical communications tool; it is especially important for communications to those more remote areas that noncommercial public radio stations have a mission-based drive to serve.

As a non-profit membership corporation that produces, acquires, and distributes programming to approximately 1,100 noncommercial public radio stations nationwide, NPR files these comments on behalf of local public radio stations. At the local level, NPR Members and other public radio stations are independently owned, noncommercial organizations dedicated to providing important public services for their communities, including life-saving public safety and emergency

alerting along with noncommercial educational news, information, and cultural programming. Public radio stations reach nearly 99 percent of the U.S. population over the air, broadcasting news and information to urban, rural, and underserved areas of the country, including areas with no other local information sources.²

These public radio stations mainly rely on the Upper C-band to receive non-locally produced noncommercial educational news, information, and cultural programming, and share their locally produced programming with other stations and producers for broader distribution. Satellite currently provides the most reliable distribution platform, while terrestrial currently is a useful back-up. Public radio stations utilize satellites to receive and share programming because they provide secure, reliable connections compared to alternative options. Alternative terrestrial-only distribution options, like broadband, are prone to becoming offline or unreliable, particularly during power outages, which could impact public radio stations' life-saving work during emergencies, including the transmission of Presidential-level alerts. Other satellite-based distribution options, such as Ku-band satellite service, are more prone to natural interference like rain fade.

The Commission therefore should ensure that a sufficient range of the Upper C-band remains available to incumbent users, like public radio stations, so they can continue utilizing the Upper C-band as earth station operators, with the same reliable connections that they currently enjoy. The Commission could meet the congressional mandate to make mid-band spectrum available for terrestrial wireless services while protecting the incumbent users at the same time. The Commission should consider reserving at least 100 MHz to ensure that incumbent users can

² For example, in rural areas of Alaska, there are three counties where public radio is the only news source for residents. See Zachary Metzger et al., *The State of Local News: 2024 Report* at 16, MEDILL LOC. NEWS INIT., NORTHWESTERN UNIV., (Oct. 23, 2024), <https://localnewsinitiative.northwestern.edu/projects/state-of-local-news/2024/>.

continue to operate without interference. Protecting the incumbent users will ensure that, among others, public radio stations can continue to provide vital services without interruption.

II. TRANSITION COST REIMBURSEMENT SHOULD COVER ALL REASONABLE COSTS ASSOCIATED WITH TRANSITIONING

If a sufficient range of the Upper C-band cannot remain available to earth station operators to ensure that they can utilize the same reliable connections that they currently have with the Upper C-band, the Commission should ensure that transition cost reimbursement covers all reasonable costs necessary to make the earth station operators whole again after transitioning away from the Upper C-band. The Commission proposes to “require any actual transition costs needed to clear existing Upper C-band operations in the contiguous United States to be ‘reasonable’ in order to qualify for reimbursement and will not permit reimbursement for equipment upgrades beyond what is necessary to clear the band.”³ NPR supports the Commission’s proposal, but urges the Commission to clarify that “reasonable” costs would include all that are necessary to make the incumbent users whole again.

For example, the NPRM says that costs associated with an incumbent moving to the Ku-band would be reasonable but not costs associated with implementing additional capacities that would act as backups to the Ku-band. However, that approach would not reflect that the quality of the Ku-band services is not the same as that of the Upper C-band services.⁴ In order to guarantee the same secure, reliable connections that the Upper C-band services offer, incumbent users may be required to utilize both broadband-based connections and Ku-band connections with both acting as each other’s backup, as an example. This solution would require incumbent users to replace their

³ Notice, para. 96.

⁴ Alaska’s geography, for example, significantly weakens Ku-band’s connectivity in Alaska and therefore public radio stations in Alaska cannot rely on Ku-band alone for secure and reliable connections.

existing C-band equipment with Ku-band equipment and add equipment necessary to receive broadband-based connections. Similarly, depending on the incumbent users' needs, they may choose other alternative combinations of available services, like combining direct satellite connections, broadband internet, and satellite internet all together, to ensure secure and reliable connections.

Changes like these should not be considered "equipment upgrades beyond what is necessary to clear the band,"⁵ because these changes would have to be made to ensure that the incumbent users who are required to transition can enjoy the same quality of services and uptime they were utilizing via the Upper C-band. The changes the incumbent users would need to make involving additional capacities would not be about taking advantage of the transition to "upgrade" the incumbent users' equipment – instead, such changes would be necessary steps that the incumbent users would have to make to maintain their services. NPR therefore urges the Commission to clarify that reasonable transition costs eligible for the reimbursement would include all reasonable costs accrued by the incumbent users while ensuring the same degree of secure and reliable connections they had with the Upper C-band. This is the only approach that will make the affected incumbent users whole again after transitioning away from the Upper C-band.

III. ALL AFFECTED EARTH STATION OPERATORS SHOULD BE ELIGIBLE FOR TRANSITION COST REIMBURSEMENT

The Commission proposes to limit transition-cost reimbursement to "incumbent earth stations" that are listed in the Commission's list of incumbent earth stations.⁶ NPR encourages the Commission to ensure that the list is exhaustive and does not exclude earth stations that may have

⁵ *Id.*

⁶ Notice, para. 84-85.

had a temporary lapse in their licensing status during the eligible period, as a result of repairs, replacement, or relocation of their equipment.

The Commission also proposes to limit transition-cost reimbursements to incumbent earth stations that are located in CONUS only, if the Upper C-band transition is limited to operations in CONUS.⁷ Even in that case, NPR urges the Commission to clarify that earth station operators outside of CONUS are also eligible for transition cost reimbursement, if such earth station operators need to follow their CONUS peer's transitions out of business or service necessities. Many of the earth station operators outside of CONUS would likely need to make the same changes their CONUS peers are making to stay connected to the wider networks. For example, if the results of the reallocation of the Upper C-band require all CONUS public radio stations to transition away from the Upper C-band, it would be impractical to continue distribution in the Upper C-band only for public radio stations outside of CONUS. Americans located in Alaska, Hawaii, Guam, Puerto Rico, and the U.S. Virgin Islands depend upon the information and alerting services provided by public radio stations connected to programming and Presidential-level alerts through the Upper C-band, and given the importance of these locations to U.S. national security, these communities would face enhanced risk if the stations in these areas could not successfully transition and services or reliability declined. To ensure that stations outside of CONUS can continue their vital services to their more vulnerable communities, the Commission should clarify that incumbent users outside of CONUS are eligible to receive transition cost reimbursement even if the Upper C-band transition is limited to operations in CONUS.

⁷ Notice, para. 97.

IV. CONCLUSION.

NPR supports the Commission's efforts to satisfy the congressional mandate to make mid-band spectrum available for terrestrial wireless services and to restore U.S. leadership in wireless. The Commission, however, should ensure that incumbent users of the Upper C-band are either unaffected by the reallocation, or made whole after transitioning away from the Upper C-band. The Upper C-band remains an important distribution tool for public radio stations that provide important public services to their communities, including life-saving public safety and emergency alerting and noncommercial educational news, information and cultural programming. By ensuring that incumbent users of the Upper C-band can continue to utilize the same secure and reliable connections they currently receive via the Upper C-band, the Commission can help public radio stations to continue their important public services to their communities.

Respectfully submitted,

NATIONAL PUBLIC RADIO, INC.

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