

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

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

REPLY COMMENTS OF AT&T SERVICES, INC.

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AT&T Services, Inc., together with its affiliates (collectively, “AT&T”) hereby submits these reply comments in response to the Federal Communications Commission’s (“FCC” or “Commission”) Notice of Proposed Rulemaking proposing to make spectrum in the 3.98-4.2 GHz band (“Upper C-band”) available for terrestrial wireless flexible use via competitive bidding.¹

I. INTRODUCTION AND SUMMARY

AT&T appreciates the Commission’s efforts to restore U.S. leadership in wireless, putting America back on track by moving with lightning speed to free this critical swath of mid-band spectrum for terrestrial wireless use. Commenters broadly agree that the Upper C-band represents a unique opportunity to unlock a key segment of mid-band spectrum that is already internationally standardized for 5G. The Commission should make the most of this rare chance to jumpstart U.S. spectrum pipeline initiatives by making the Upper C-band available for terrestrial wireless on a licensed, exclusive-use basis. The exclusive-use licensing framework has long been the bedrock of our vibrant wireless ecosystem and extending it to the Upper C-

¹ *Upper C-band (3.98 to 4.2 GHz)*, Notice of Proposed Rulemaking, FCC 25-78 (2025) (“NPRM”). Unless otherwise noted, all comments were filed on January 20, 2026 in response to the NPRM in this proceeding.

band will help ensure the spectrum can be deployed to deliver the robust networks consumers expect today.

The record confirms that establishing a synchronized, firm timeline for completing the Upper C-band transition will be critical to the success of this proceeding. To that end, the Commission should continue to press stakeholders for more granular data about their proposed transition timelines, spectral clearing targets, and associated costs. More information is needed about how these forecasts have been calculated and what variables may impact them so that the Commission and stakeholders alike can meaningfully evaluate different proposals and coordinate transition timelines across industries. Achieving Congress's goals requires not only the timely auction of the Upper C-band, but swift *access* to the spectrum as well. Minimizing the time between the conclusion of the auction and bidders' ability to access and deploy the spectrum purchased at auction will be critical to spectrum valuations and should remain a focal point of the Commission's efforts.

Finally, commenters widely agree that Commission's successful approach to transitioning and licensing the 3.7-.98 GHz band ("Lower C-band") should serve as the blueprint for this proceeding. The Commission should leverage lessons learned to refine and adapt the proven Lower C-band framework for the Upper C-band. In doing so, the Commission should resist calls to overly complicate the Upper C-band spectral ecosystem. In light of the challenges inherent in this multi-stakeholder transition, the Commission should prioritize simplicity and refrain from taking actions that could unnecessarily complicate and delay the undertaking. The Commission should also improve the performance of the Clearinghouse by implementing the common-sense reforms set forth by CTIA, which will bolster efficiency, accountability, and oversight.

II. COMMENTERS AGREE THAT THE COMMISSION SHOULD UNLEASH THE UPPER C-BAND FOR EXCLUSIVE, LICENSED TERRESTRIAL WIRELESS USE.

A. The Record Confirms the Upper C-Band Will Play a Critical Role in Advanced Mobile Services.

Stakeholders broadly agree that the Upper C-band will play a key role in 5G and beyond.² U.S. mobile networks experienced a historic surge in data usage in 2025 and that trend shows no signs of slowing.³ For the third year in a row, demand grew roughly 35%, a pace that would nearly double the amount of data used every two years.⁴ Americans are using more and more 5G data—at home, on the road, and across industries—fueling growth across multiple economic sectors.⁵ This historic growth underscores the importance of the Commission’s efforts in this proceeding to free additional mid-band spectrum for full power, licensed terrestrial wireless use.

As the Administration, Congress, and the Commission alike have recognized, the Upper C-band represents a unique opportunity to propel the U.S. forward in wireless leadership, strengthening “America’s foundation for emerging 5G and 6G innovations while delivering new and affordable broadband services to communities across the country.”⁶ The Upper C-band is a “critical swath of internationally harmonized spectrum that can be deployed quickly,” for the highest-performance 5G functionality.⁷ The Commission should thus move forward with its

² See, e.g., CTIA Comments at 4-8 (emphasizing the importance of C-band spectrum for next generation wireless advancement); Competitive Carriers Association (“CCA”) Comments at 1-2 (noting the importance of mid-band spectrum for advanced wireless services in rural areas); Cisco Systems, Inc. Comments at 3-5 (stressing the importance of licensed wireless connectivity for 6G and AI development).

³ See CTIA, Annual Survey Highlights, available at [2025-Annual-Survey-Highlights.pdf](#)

⁴ *Id.* at 2.

⁵ *Id.*

⁶ NPRM at Carr Statement.

⁷ Qualcomm Comments at 2-3. The Upper C-band will be an important step in addressing the current U.S. spectrum shortfall. But alone, it will not be enough to keep pace with

efforts to build upon the success of the Lower C-band by unleashing as much Upper C-band spectrum as possible for exclusively licensed terrestrial use.⁸

In doing so, the Commission should ensure that all Americans are able to reap the benefits of the innovative services that flow from additional mid-band spectrum in the marketplace. To this end, it should seek additional information on the possibility of freeing C-band spectrum for terrestrial wireless use in U.S. states and territories that are outside the contiguous United States (“OCONUS”), including significant markets like Hawaii. Although some commenters have indicated that the Commission should preserve the C-band status quo in OCONUS areas, none have shown why coexistence is not feasible.⁹ At a minimum, the Commission should collect data regarding space and earth station operations in OCONUS areas so that stakeholders can meaningfully assess the merits of unleashing C-band spectrum in those areas.¹⁰

B. The Commission Should Make The Upper C-Band Available For Full Power, Licensed Exclusive Use, Relying On The Successful Lower C-Band Model.

Licensed, exclusive-use spectrum has long been the cornerstone of the thriving mobile wireless ecosystem in the United States and it will continue to drive investment, innovation, and competition for decades to come.¹¹ As the Commission recognized in the context of the Lower

skyrocketing demand. The Commission will need to continue identifying additional spectrum to support mobile broadband.

⁸ See Verizon Comments at 4.

⁹ See, e.g., SES Americom, Inc. (“SES”) Comments at 29 (arguing that the Commission should preserve the status quo OCONUS without explanation); National Association of Broadcasters (“NAB”) Comments at 7; CCA Comments at 6-7.

¹⁰ See CTIA Comments at 14-15.

¹¹ See CTIA, *Exclusive-Use Licensed Spectrum Is the Best Model for Building Highly-Secure Wireless Networks, According to New Report* (May 24, 2023), available at

C-band, granting flexible-use spectrum rights on an “exclusive, geographic basis” gives “certainty to licensees and provide[s] the efficiencies of scale and scope” that propel the “rapid deployment of next generation services.”¹² So too here. The record strongly supports issuing licenses on an exclusive-use basis, thereby creating incentives for efficient, balanced spectrum use and spurring investment.¹³

The Commission should resist calls to allow secondary satellite use of the C-band where terrestrial service is not deployed and, more broadly, to adopt new satellite allocations for the band.¹⁴ Doing so would have significant negative effects on the mobile wireless ecosystem throughout the band. In the Lower C-band, it would fundamentally alter licensees’ rights, upending reasonable investment-backed expectations in spectrum purchased at auction for billions. In the Upper C-band, it would impact spectrum valuations and decrease auction participation and revenue. Indeed, allowing some providers free access to the spectrum while charging others a premium would roil valuation efforts and distort the market.

Exclusive use rights provide winning bidders with the certainty and assurance necessary to deploy and manage wireless facilities and serve the public across their entire market area without risk of harmful interference. Proposals to, in effect, authorize spectrum land grabs would threaten the ability of wireless providers to deploy the spectrum and to provide the robust advanced mobile services that Americans expect. Moreover, introducing secondary satellite use

<https://www.ctia.org/news/exclusive-use-licensed-spectrum-is-the-best-model-for-building-highly-secure-wireless-networks-according-to-new-report>

¹² Lower C-band Order ¶ 76.

¹³ See Verizon Comments at 21-22; CTIA Comments at 30; T-Mobile Comments at 4.

¹⁴ See, e.g., SpaceX Comments at 3-4. Questions regarding the suitability of the Upper C-band for supplemental coverage from space (“SCS”) should be addressed in a separate proceeding that builds a robust record analyzing the feasibility of allowing SCS operations throughout the entirety of the C-band.

of the Upper C-band raises numerous technical questions that remain unanswered. For example, it is unclear whether and how satellite signals could coexist within a Time-Division Duplex (“TDD”) ecosystem, or whether they could coexist with other FSS use or adjacent radio altimeter (“RA”) operations. The Commission should not introduce additional technical complexities and delays into this proceeding and risk jeopardizing the potential of this critical swath of spectrum.

Instead, the Commission can best ensure that the Upper C-band is put to its highest and best use by reaffirming its commitment to granting exclusive use licenses and encouraging robust post-auction secondary market activity. In future proceedings, for example, the Commission could consider permitting the use of market-based solutions to enable innovative satellite use cases where doing so would not cause interference to the wireless ecosystem.¹⁵ Because this undertaking would raise numerous technical challenges, however, the Commission should refrain from pursuing this approach at this time. It is beyond the scope of this complex proceeding and would invite additional delay and technical challenges.

III. MORE DETAILED INFORMATION IS NEEDED TO EVALUATE TRANSITION PROPOSALS

In opening comments, stakeholders across the board made clear that a successful Upper C-band auction will require transparency, robust information sharing, and inter-industry collaboration.¹⁶ As the record reveals, transitioning the Upper C-band will require the completion of numerous, coordinated steps to succeed, across different industries and

¹⁵ See generally NPRM at Carr Statement (extolling the benefits that flow from secondary market transactions putting large swaths of spectrum into the hands of those that can “put to productive use quickly”).

¹⁶ See, e.g., CTIA Comments at 18-20; Airlines for America (“A4A”) Comments at 7-10; Boeing Comments at 5-9, 16-17; SES Comments at 10-13; NAB Comments at 10 (emphasizing the importance of pursuing a coordinated and transparent transition approach); Qualcomm Comments at 4.

government agencies.¹⁷ Commenters have set forth various timelines for the transition effort, which will ultimately need to be refined and synchronized to successfully transition the spectrum. Establishing a firm, certain timeline will be critical to potential bidders considering whether to participate in the auction. In doing so, the Commission should minimize the gap between the completion of the auction and winning bidders' access to the spectrum for deployments as this will have a significant impact on spectrum valuations.

The Commission should also continue to collaborate with its federal partners and press stakeholders to submit relevant, granular data to create a robust record on key issues. Bidders need certainty about the timelines, costs, and clearance variables to meaningfully evaluate potential transition proposals. To the extent the deadline for RA retrofits becomes a gating factor for Upper C-band deployments, for example, that may raise questions about whether accelerated FSS clearing is necessary in the first place. Stakeholders will need to grapple with these issues as they move toward coalescing around a comprehensive transition timeline. To this end, the Commission should encourage FSS stakeholders and the aviation industry to provide more detailed showings, as outlined below.

FSS Data. To promote more informed decision-making in this proceeding, the Commission should seek additional information on space station and earth station operations. With respect to space station operations, the Commission should seek granular data on anticipated capacity gains, customer needs, and other relevant variables that could impact the transition of existing services. With respect to earth stations, the Commission should seek

¹⁷ See CTIA Comments at 18-20; A4A Comments at 7-10 (outlining steps that will need to be taken by aviation stakeholders); SES Comments at 10-13 (detailing steps that will need to be taken by FSS operators to clear the spectrum).

information regarding band usage trends and other parameters that have the potential to impact transition timelines.¹⁸

Although FSS providers have provided estimates as to when they may be able to clear certain tranches of the band, stakeholders need a better understanding of what drives the proposed FSS spectrum clearing targets, the associated timelines, and the differences in cost magnitude. Collecting more granular data and analysis showing how the proposed spectral targets and timelines were calculated and what costs and factors drive them will help shed light on the benefits and tradeoffs that the Commission and the public should consider as they evaluate these proposals. In doing so, as noted above, the Commission should seek data on the costs, timelines, spectrum clearing targets and coexistence challenges that would impact clearing C-band spectrum in OCONUS areas as well.

Aviation Data. More detailed information is also needed with respect to the anticipated timelines associated with RA retrofits.¹⁹ The record reflects considerable uncertainty about the timeline for the retrofit of RAs on eligible aircraft.²⁰ The FAA’s companion NPRM proposes a

¹⁸ See CTIA Comments at 14-15 (highlighting key data points bidders need to evaluate FSS transition proposals); Verizon Comments at 5.

¹⁹ The timeline within which bidders will be able to access the spectrum they have purchased at auction is particularly critical for spectrum valuations. If bidders will not be able to access the spectrum for years after the auction concludes, prices – and auction revenue – will be depressed.

²⁰ To be sure, RAs do not currently operate in the Upper C-Band; they operate in adjacent spectrum and their upgrade effort has been years in the making. Recognizing international trends reassessing existing mid-band spectrum use cases, the worldwide aviation industry has been working since 2019 to revise its international Minimum Operational Performance Standards (“MOPS”) for RAs operating in the adjacent 4.2-4.4 GHz band. Although the FAA has only recently initiated a rulemaking to set deadlines for retrofit completions, this process has been a long time coming, originating prior to the Commission’s effort to reallocate the Upper C-band.

timeline for completing retrofits between 2029 and 2032.²¹ In this proceeding, however, aviation stakeholders have signaled that they are continuing to assess the feasibility of that timeline.²² A4A indicates that the process may take more than 3-6 years;²³ Thales suggests that 2031 may be achievable if certain conditions are met;²⁴ and Lockheed warns that 2032 may be “very ambitious.”²⁵ Taken together, the aviation industry appears skeptical about whether the FAA’s proposed timeline is achievable.

The Commission should continue to press aviation stakeholders for certainty and additional information about what will be required to facilitate a swift transition to wireless broadband deployments. As CTIA explains, it is “axiomatic that bidders in Commission spectrum auctions need sufficient information to make informed bidding decisions.”²⁶ In this case, details about the variables that may impact the projected timelines for completing RA retrofits are necessary to help bidders understand when they may have actual access to the spectrum they acquire at auction to begin deployments, which in turn, will impact spectrum valuations. NTIA correctly underscores the importance of information transparency on this issue, emphasizing that the “Commission is right” to seek “detailed information from radio altimeter manufacturers and other stakeholders.”²⁷ Only with “access to comprehensive, reliable

²¹ See *Requirements for Interference-Tolerant Radio Altimeter Systems*, Docket No. FAA-2025-5666, Notice of Proposed Rulemaking, Notice No. 26-02, 91 Fed. Reg. 459 (Jan. 7, 2026).

²² See Boeing Comments at 4-5 (explaining that the proposed FAA timeline is “dependent upon a number of stakeholders and variables that the aviation industry is currently assessing”).

²³ See A4A Comments at 18-19 (noting that A4A’s “initial reaction” is that a “upgrade deadline slightly longer than six years is more reasonable”).

²⁴ Thales Comments at 10-11.

²⁵ Lockheed Martin Comments at 7-8.

²⁶ CTIA Comments at 19.

²⁷ NTIA Comments at 4.

data,” will the Commission be able to provide bidders with confidence about when the spectrum will be available.²⁸

IV. THE RECORD SUPPORTS APPLYING THE LOWER C-BAND FRAMEWORK TO THE UPPER C-BAND.

Commenters broadly agree that the Commission should proceed with applying the successful Lower C-band licensing framework to the Upper C-band.²⁹ As stakeholders recognize, doing so will provide licensees with a consistent framework that accelerates the deployment of cutting-edge technologies.³⁰ To this end, the record reveals strong support for adopting the proposed: (i) block sizes and configurations, (ii) geographic licensing scheme, (iii) license term and renewal standards, (iv) secondary market policies, and (v) foreign ownership reporting requirements.³¹ These rules have worked well in transforming the Lower C-band into a thriving wireless ecosystem and will do so here too.

²⁸ *Id.*

²⁹ As a threshold matter, PSSI Global Services LLC’s (“PSSI”) claim that transitioning any portion of the Upper C-band would be an impermissible modification under Section 316 is wrong. *See* PSSI Comments at 19-21. PSSI completely misconstrues the D.C. Circuit opinion that it purports to rely on. *See id.* The D.C. Circuit did not establish a magical reserve of 200 MHz of C-band spectrum for the occasional use earth stations of small satellite operators, as PSSI claims. To the contrary, it upheld the Commission’s finding that because such operators provided “little to no service” in the C-band, it was entirely reasonable for the FCC to transition them to alternate spectrum. *PSSI Global Servs. LLC v. FCC*, 983 F.3d 1, 8 (D.C. Cir. 2020). More broadly, PSSI ignores the OB3 congressional mandate, which requires the Commission to auction *at least* 100 MHz of this spectrum by July 2027 for terrestrial wireless use. Taking PSSI’s reasoning to its logical conclusion, the Commission would be barred from complying with the OB3’s auction directive.

³⁰ *See, e.g.*, CTIA Comments at 30-32; T-Mobile Comments at 3-4; Verizon Comments at 21-22. As it has time and again, the Commission should reject calls to adopt a geographic licensing scheme based on counties or cellular market areas. *See* CCA Comments at 4-5, Rural Wireless Association Comments at 6-8. As the Commission has repeatedly recognized, licensing on a Partial Economic Area (“PEA”) basis will promote harmonization with the Lower C-band, thereby facilitating efficient spectrum use and the rapid assignment of licenses. NPRM ¶ 32.

³¹ *See, e.g.*, CTIA Comments at 30-32; T-Mobile Comments at 3-4; Verizon Comments at 21-22.

The record also supports aligning the technical rules for the Upper C-band with those adopted for the Lower C-band, with targeted tweaks.³² Commenters recognize that harmonized technical rules will produce significant economies of scale, resulting in the rapid expansion of C-band deployments.³³

Out of Band Emission (“OOBE”) Limits. The record supports applying the Lower C-band OOBE limit (-13 dBm/MHz) to the Upper C-band.³⁴ This limit has long been applied in other mobile bands and has proven successful in protecting incumbent services in adjacent bands.³⁵ As SES explains, the Lower C-band limits have “been effective to date in protecting FSS operations in the Upper C-band...and there is every reason to believe that they will be effective at the new band edge.”³⁶ More broadly, harmonizing the OOBE limits across the Lower and Upper C-band segments will help achieve a more robust wireless ecosystem as carriers will be able to leverage economies of scale and deploy multi-band equipment across the entire 3 GHz band.³⁷

Nevertheless, NAB claims, without any evidence, that the OOBE limit has “failed to provide adequate protection” in the Lower C-band.³⁸ NAB cites no instances of interference

³² See Nokia Comments at 4; Ericsson Comments at 11-12; Qualcomm Comments at 2-3, 5; Verizon Comments at 21-25; CTIA Comments at 30-33; T-Mobile Comments at 4-5.

³³ See, e.g., Qualcomm Comments at 2-3; CTIA Comments at 30-31.

³⁴ See CTIA Comments at 34-35; Verizon Comments at 24-25; T-Mobile Comments at 5; Qualcomm Comments at 6-7.

³⁵ See NPRM ¶ 58 (noting that the proposed OOBE limit “has been widely accepted as being adequate for reducing unwanted emissions in adjacent bands”).

³⁶ SES Comments at 31.

³⁷ The debate about the appropriate OOBE limits for spurious emissions in the 4.2-4.4 GHz range where RAs operate remains ongoing. AT&T is actively collaborating with wireless and aviation stakeholders to reach consensus on that key coexistence limit.

³⁸ NAB Comments at 9.

issues; nor could they. AT&T is not aware of any interference claims in the Lower C-band that have not been fully addressed. NAB offers no reason to depart from the OOB limits that have proven highly successful in the Lower C-band.³⁹ The Commission should instead move forward with its proposal to apply the Lower C-band OOB limit to the Upper C-band.

Power Limits. Commenters support adopting the same power limits for fixed and base stations in the Upper C-band as those used in the Lower C-band.⁴⁰ For mobile devices (which do not include handsets), A&T agrees that the Commission should adopt a 4 Watt EIRP power limit. As commenters make clear, a 4 Watt limit would facilitate additional home broadband deployment equipment, which Chairman Carr has recognized is fostering competition and lowering consumer prices.⁴¹ Qualcomm’s analysis also shows that mobile uplink performance and coverage is “greatly improved” for customer premises equipment with the proposed increased transmit power.⁴² In short, the 4 Watt limit “aligns with modern network designs, promotes innovation, and maintains protection of adjacent channel operations.”⁴³

Incumbent Protections. The record confirms that the Commission should retain the existing, limited protections for telemetry, tracking, and command (“TT&C”) operations only through December 5, 2030.⁴⁴ Consistent with the *Lower C-band Order*, the Commission should

³⁹ NAB appears to seek radiated OOB limits, rather than conducted limits, which they posit will be more stringent. *See id.* But the current power flux density (“PFD”) limits for FSS protection in the Lower C-band are, in effect, already radiated. *See* 47 C.F.R. § 27.1423 (establishing an out of band PFD limit that is in effect a radiated limit at registered incumbent earth station antennae).

⁴⁰ *See, e.g.,* Verizon Comments at 23.

⁴¹ *See* Carr NPRM Statement. *See also* Comments of Qualcomm at 5-6; Comments of Verizon at 24; Comments of CTIA at 32-34.

⁴² Qualcomm at 5.

⁴³ *Id.* at 6.

⁴⁴ *See* Verizon Comments at 25; CTIA Comments at 36-37.

reaffirm that the TT&C protections at three grandfathered sites do not apply to the full band and arc or any use cases other than TT&C.⁴⁵ Separately, the record reveals robust support for adopting the same Lower C-band incumbent FSS protection criteria for the Upper C-band.⁴⁶ AT&T agrees with these commenters, including FSS operators, who recognize that the Commission should extend its successful FSS protection measures into the Upper C-band.

V. THE COMMISSION SHOULD RESIST CALLS TO OVERLY COMPLICATE THE UPPER C-BAND SPECTRAL ECOSYSTEM.

As the Commission recognizes, freeing the Upper C-band for terrestrial wireless use will require numerous stakeholders to closely collaborate throughout a transition process that will be “technically challenging, complex, and resource-intensive.”⁴⁷ Completing the mission will be a “tall order under the best of circumstances.”⁴⁸ Against this backdrop, the Commission should pursue simplicity in this proceeding and decline to adopt proposals that would further complicate the Upper C-band spectral environment.⁴⁹

For example, the Commission should not allow satellite relay services in the C-band at this time.⁵⁰ Instead, it should gather additional information on why relay services are required and why such services must be permitted in the C-band spectrum specifically, as opposed to

⁴⁵ See *Expanding Flexible Use of the 3.7 to 4.2 GHz Band*, Report and Order and Order of Proposed Modification, 35 FCC Rcd 2343, 2427-28 ¶ 376 (2020).

⁴⁶ SES Comments at 31-32; Verizon Comments at 25, n. 84; CTIA Comments at 36;

⁴⁷ Comments of SES at 3.

⁴⁸ NPRM, Chairman Carr Statement.

⁴⁹ Along these lines, calls to clear 6 GHz to permit additional uplinks are beyond the scope of this proceeding. See NAB Comments at 11-12; North American Spectrum Alliance Comments at 3-4. In any event, any expanded satellite use of the 6 GHz band should come with obligations to engage in prior coordination with existing users, including point-to-point links.

⁵⁰ See SES Comments at 30-31 (proposing to allow the entire C-band for satellite relay services from GSO to lower orbit satellites on a secondary basis).

other spectrum. Additional technical studies also need to be done to confirm that the proposed relay services would have no impact on terrestrial deployments. At a minimum, the Commission should defer consideration of this proposal until this issue has been fully studied for WRC-31.

Likewise, the Commission should not open a new earth station registration window. Although some commenters call upon the Commission to do so, they do not provide a compelling rationale for it.⁵¹ The Commission should not inject additional complexity into the proceeding by opening new earth station registration windows at this time. More broadly, lifting the earth station freeze would have material implications in the Lower C-band, where licenses were issued with mandates to protect a finite, known set of FSS earth stations on an adjacent channel basis. Adding new earth stations to the ecosystem at this stage would fundamentally alter Lower C-band licensee rights, disrupting Lower C-band deployments and the mobile networks they serve.

VI. STAKEHOLDERS BROADLY AGREE THAT THE COMMISSION SHOULD LEVERAGE LESSONS LEARNED TO IMPROVE CLEARINGHOUSE PERFORMANCE.

Although commenters generally agree that the Commission should leverage the *Emerging Technologies* framework for the Upper C-band transition, there is also broad consensus that the Clearinghouse process can and should be improved.⁵² The rules for the Upper C-band Clearinghouse should incorporate lessons learned from the Lower C-band transition to streamline the process while guarding against inefficiencies and incremental costs. CTIA has set forth a number of common-sense proposals to improve the performance of the Clearinghouse,

⁵¹ See, e.g., Comments of SES at 31 (asking to lift the freeze indefinitely without limitation or explanation); Comments of ACA at 15-17.

⁵² See, e.g., CTIA Comments at 25-29; SES Comments at 26-28; Summit Ridge Group Comments at 2-6; Verizon Comments at 14-16.

helping ensure that the transition is completed as quickly and efficiently as possible.⁵³ The

Commission should adopt CTIA's proposals, which include:

- *Setting firm deadlines.* The Commission should adopt clear deadlines for establishing the Clearinghouse and claims initiation. It should also impose deadlines for registration by eligible claimants, filings by any lump sum electees, and submission of final claims, among others.
- *Facilitating Efficient Review of Claims.* The Commission should adopt a shot clock for claims processing and make greater use of cost-averaging in the Cost Catalog for operators engaged in large-scale relocations.
- *Preempting Repeated Claims Disputes.* The Commission should preempt issues that repeatedly arose during the C-band transition, such as adopting a hard cap on soft costs, providing that finance charges are only compensable only if it is part of the ordinary course of business, and other issues that CTIA has identified.⁵⁴ Enforcing a hard cap on soft costs would appropriately limit administrative cost overruns and excess reimbursement.
- *Ensuring Clearinghouse Accountability.* The Commission should require annual audits and quarterly reporting and establish a process for challenging the costs of the clearinghouse itself to promote accountability and oversight.
- *Establishing a Balanced Selection Approach.* The clearinghouse search committee should have parity between claimants and new entrants. It should reflect a balanced membership that is grounded in wireless provider experience from the Lower C-band.
- *Finalizing A Detailed Cost Catalog Prior to the Auction.* An exhaustive Cost Catalog should be developed now, in parallel with the rulemaking proceeding so that it is finalized prior to the auction. Investing in such an effort at the outset will reduce ambiguity for all transition stakeholders and ultimately help streamline the process.

Implementing these proposals will help increase efficiency, minimize costs, and streamline the transition, for the benefit of stakeholders and consumers alike.

⁵³ See Comments of CTIA at 25-29.

⁵⁴ See CTIA Comments at 27.

VII. CONCLUSION

AT&T appreciates the Commission's rapid efforts to repurpose and auction the Upper C-band spectrum for full power, licensed exclusive wireless use. A broad cross-section of commenters agree that this spectrum represents a unique opportunity to address our looming spectrum deficit and propel the United States toward the next generation of wireless advancement. As the Commission moves forward in this proceeding, it should continue to prioritize transparency and information sharing among stakeholders, leveraging existing processes and lessons learned from the Lower C-band transition. AT&T looks forward to continuing to collaborate with the Commission, its federal partners, and stakeholders across industries to free Upper C-band spectrum for innovative wireless services.

Respectfully submitted,

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