



April 4, 2026

Ex Parte Comments

Honorable Brendan Carr, Chairman
Commissioner Anna M. Gomez
Commissioner Olivia Trusty
Federal Communications Commission
45 L Street, NE
Washington, DC 20554

Re: ***Office of International Affairs Seeks Comment on Recommendations Approved by the World Radiocommunication Conference Advisory Committee***
OIA Docket No. 24-30

Dear Chairman Carr and Commissioners Gomez and Trusty:

We write to urge the Commission to adopt View B as the U.S. position on Agenda Item 1.7 of the 2027 World Radiocommunication Conference ("WRC-27"). Specifically, we support View B's firm "no change" ("NOC") position for the 7.4–8.4 GHz band. Further, we agree "[i]t is premature for the United States to take a position for the 7.125–7.45 GHz frequency range while domestic and international studies remain pending."¹ View B is the only position consistent with federal law and Administration policy. Further, it best promotes U.S. technological leadership and our nation's world-leading Wi-Fi industry. My recent testimony before the Senate Commerce Committee included a discussion of Item 1.7 and is also appended to this letter.²

Agenda Item 1.7 proposes to potentially change the ITU's allocation of the upper mid-band spectrum between 7.125 and 8.4 GHz to "International Mobile Telecommunications" (IMT) for Regions 2 and 3. The FCC's WAC reported three "non-consensus" views on Item 1.7 that diverge precisely along industry lines, with mobile industry representatives supporting a

¹ *Office of International Affairs Seeks Comment on Recommendations Approved by the World Radio Conference Advisory Committee*, Public Notice, DA 26-182, OIA Docket No. 24-30 (rel. Feb. 23, 2026) ("*Public Notice*") (See Attachment A, View B).

² Written Testimony of Michael Calabrese, Director, Wireless Future Program, New America, Before the U.S. Senate Committee on Commerce, Science and Transportation, Subcommittee on Telecommunications and Media (Mar. 17, 2026), <https://www.commerce.senate.gov/meetings/u-s-leadership-at-the-world-radiocommunication-conference-2027-strategy-and-challenges-ahead-of-shanghai/>.

changed allocation to IMT and representatives from technology, cable and other companies supporting No Change. The significance is that adopting an “IMT” rather than a “MOBILE” allocation (which includes Wi-Fi) would work to restrict the flexibility of member nations to use these higher-frequency bands to meet their future needs for more Wi-Fi capacity. In the U.S. and Canada, for example, the unlicensed 6 GHz band that is fueling next generation Wi-Fi 7 and 8 with very wide contiguous channels currently extends to 7.125 GHz. The sub-bands immediately above this, including possibly some 7 GHz military spectrum, could work well for Wi-Fi on at least a low-power, indoor-only (LPI) basis. But even if the FCC were to authorize this, an IMT identification at the ITU would undermine potential global markets for the dominant U.S. enterprise Wi-Fi companies.

This disagreement is counterproductive and at best premature. In the U.S., last July’s One Big Beautiful Bill Act (“OBBBA”) specifically excluded the entire 1,000 megahertz between 7.4 and 8.4 GHz from consideration for reallocation or assignment for IMT to protect national security operations. Item 1.7 does not propose this same allocation for Region 1 (Europe, Africa, Middle East, northern Asia), since at WRC-23, this region excluded 7.25–7.75 GHz from even being studied for allocation to IMT. And, consistent with the OBBBA, NATO reportedly now supports excluding 7.75 up to 8.4 GHz from IMT as well, while European regulators would impose conditions that would protect incumbent operations. In Region 3 (the rest of Asia and Pacific nations), China is likewise reportedly opposed to allocating 7.25–8.4 GHz for IMT.

As a default, the U.S. position should oppose a change to IMT that U.S. law (OBBBA) prohibited just 9 months ago. Moreover, the OBBBA designated 7.25–7.4 GHz as one of three bands that NTIA is studying this year for potential reallocation to IMT by auction. In December, in his “Winning the 6G Race” executive order, President Trump extended that study down to 7.125 GHz. Since the results of these studies will be available before the end of this year, we agree with the leading U.S. technology companies that early IMT identification is premature and unnecessary for the moment.

View B and ‘No Change’ Best Reflects the One Big Beautiful Bill Act

The ‘no change’ position in View B position is correctly premised on the fact that Congress has effectively directed the U.S. position on Item 1.7. The OBBBA signed into law by President Trump on July 4, 2025, explicitly excludes the 7.4–8.4 GHz band from the spectrum that NTIA is directed to identify for reallocation and auction for full-power commercial licensed use.³ This exclusion was not an oversight. It was a deliberate legislative judgment to protect critical national security and federal mission operations that depend on this spectrum. As Broadcom noted in its comments, this represents “the unprecedented move of legislatively

³ An Act to Provide for Reconciliation Pursuant to Title II of H. Con. Res. 14, Pub. L. No. 119-21, § 40002, 139 Stat. 72, 128–30 (2025) (“OBBBA”) at §§ 40002(a)(3)(B), 40002(b)(1).

excluding the 7.4-8.4 GHz spectrum from study or use by IMT," an "extraordinary deference to existing national security systems" that "underscores their importance."⁴

As Senator Deb Fischer, chairman of the Senate Commerce Subcommittee on Telecommunications and Media, stated during the March 17 hearing at which I testified that it would be an unprecedented and troubling step for the Commission to advance, as a U.S. treaty negotiating position, an outcome that Congress has expressly forbidden domestically. As NCTA correctly observed, View C "would have the United States seek to amend an international treaty to reflect a position that it cannot adopt or benefit from itself."⁵ The Presidential Memorandum makes it clear that the Administration, in compliance with the OBBBA, envisions the 7.4–8.4 GHz portion of the band as a potential *destination* for relocated federal systems, not as a candidate for commercial wireless deployment. NTIA adopts this approach in reaching in its own submission to the Commission, which supports "no change" for 7.4-8.4 GHz "to enable the robust operations of the currently allocated services."⁶

Accordingly, the viability of IMT in 7.125–7.4 GHz will not be clear until NTIA's studies determine if and where Federal systems can be moved. This makes View A similarly premature at best. Moreover, we agree with Apple that: "Views A and C would extend IMT identification above 7.4 GHz, contrary to Congressional intent."⁷ The Commission should not place the United States in the position of championing at the ITU a spectrum outcome that the American people, through their elected representatives, have prohibited at home.

View B Best Serves the Interests of U.S. Industry and Technological Leadership

The U.S. should resist taking positions or making concessions that undermine an important U.S. industry or interest. At WRC-27, this will be most evident with respect to LEO satellite and other space-based services, where the U.S. is by far the world's dominant player and other nations will seek to slow American companies down as they struggle to catch up. Telecommunications equipment is another industry with a sharp dichotomy. As I testified, the U.S. dominates the global enterprise Wi-Fi equipment market, with Cisco and HPE Aruba holding a combined 55 percent global share, while China's Huawei is a distant third with a 9 percent share. In contrast, for mobile cellular equipment, Huawei's global market share (31

⁴ Comments of Broadcom Inc., OIA Docket No. 24-30, at p. 2 (Mar. 6, 2026).

⁵ Comments of NCTA – The Internet & Television Association, OIA Docket No. 24-30, at 4 (Mar. 6, 2026).

⁶ Letter from Derek Khlopin, Deputy Associate Administrator for Spectrum Plans and Policy, NTIA, to Thomas Sullivan, Chief, Office of International Affairs, FCC (Feb. 18, 2026), as reproduced in Public Notice ("NTIA Letter").

⁷ Comments of Apple Inc., OIA Docket No. 24-30, at 5 (Mar. 6, 2026).

percent in 2024) is more than Europe's Nokia and Ericsson combined, while the U.S. has no significant part of that market.

It is not surprising, therefore, that China's agenda for upper 6 GHz is to use WRC-27 as an opportunity to persuade more nations to exempt themselves from the current and flexible "MOBILE" allocation adopted in 2023 for the upper 6 GHz band and instead indicate a preference for IMT (which excludes Wi-Fi) via footnote modifications to the international regulations, as Brazil and Mexico have already done. If China is successful in recruiting more nations to jump into IMT footnotes, the outcome is an expanded and lucrative market for their national champions (Huawei and ZTE). At the same time, China is the only major nation in the world that has not allocated even the lower 6 GHz (up to 6.425 GHz) for Wi-Fi. Not only is Wi-Fi a U.S.-dominated industry, it is a pervasive form of decentralized communication technology that is far more difficult for an authoritarian regime to surveil and censor. We believe the U.S. should not take or accept any position that undermines a harmonized—and hence larger—global market for Wi-Fi equipment and services.

Accordingly, an IMT identification in the 7/8 GHz band only serves the commercial interests of foreign equipment vendors—principally the interests of China— while a flexible MOBILE allocation (no change) preserves spectrum that could support the continued global growth of U.S.-led unlicensed technologies, including Wi-Fi 7 and the emerging Wi-Fi 8 standard. Because the 7.25–7.4 GHz band was excluded at WRC-23 for IMT in Region 1, claims of promoting the harmonization of global equipment markets is highly misleading, unless the mobile industry commenters primarily have harmonization with Chinese telecom and handset makers in mind.

Moreover, as NCTA points out, the Presidential Memorandum on "Winning the 6G Race" sets out a vision for U.S. leadership in 6G that includes "steadfastly advancing American interests in the international standards bodies that will play a crucial role in 6G development, and identifying a significant volume of radiofrequency spectrum that can be harmonized for 6G networks internationally."⁸ Advocating for IMT identification in the 7.4–8.4 GHz band – which is prohibited for reallocation to IMT use in the U.S. – "will plainly undercut these leadership goals by encouraging an equipment market for 6G that will be completely inaccessible to Americans."⁹

View B's No Change Position is Best Aligned with Administration Policy

It is simply premature for the U.S. to take a position on the allocation of the 7.125–7.45 GHz band segment until the results of NTIA's technical study are available later this year. The

⁸ Presidential Memorandum, *Winning the 6G Race* §§ 2–3 (Dec. 19, 2025), <https://www.whitehouse.gov/presidential-actions/2025/12/national-security-presidentialmemorandum-nspm-8-0bda/> ("Presidential Memorandum").

⁹ Comments of NCTA at 8.

results of NTIA’s studies of the bands specified in the OBBBA and Presidential Memorandum will allow U.S. decisionmakers to take a data-based, informed position regarding Item 1.7 well before the CITELE preparatory meetings that will ultimately formulate positions for Region 2. NTIA’s conclusions will be available with ample time for regional views to form, as WifiForward and other stakeholders that “[t]he U.S. should have the published conclusions of a technical study on 7.125-7.4 GHz *before* taking a treaty negotiation position.”¹⁰

Further, while the OBBA does identify 7.25–7.4 GHz band for study, it is the smallest among the three IMT study bands that also include 2.7–2.9 GHz and 4.4–4.9 GHz, bands, both of which have propagation characteristics far more conducive to cellular network coverage and indoor use. NTIA will only have a full picture of the potential reallocation that best serves U.S. interests overall after it completes its studies of the 2.7–2.9 GHz and 4.4–4.9GHz bands later this year. Cumulatively, these studies will give policymakers a far better picture of whether, if at all, relatively high frequency spectrum above 7.125 GHz should be a priority for IMT in the near future.

In short, taking a U.S. treaty position now, before those studies are complete, is not leadership—it is improvisation. We agree with Cisco that a position in favor of IMT identification at this time “would not only undermine the ongoing studies directed by the President, but also potentially threaten the integrity of incumbent federal systems operating in the band.”¹¹ Waiting until the NTIA studies are complete is the position that “ensures that the U.S. does not foreclose future options or disrupt existing vital infrastructure before a viable coexistence framework is established.”¹²

Respectfully submitted,

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¹⁰ Comments of WifiForward, OIA Docket No. 24-30, at 3-4 (Mar. 6, 2026); Comments of NCTA at 1, 6; Comments of Broadcom at 1; Comments of Cisco at 1; Comments of Dynamic Spectrum Alliance at 2.

¹¹ Comments of Cisco Systems, Inc., OIA Docket No. 24-30, at 2 (filed Mar. 6, 2026) (“Cisco Comments”).

¹² *Id.* at 1.