



June 18, 2026

VIA ELECTRONIC FILING

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

Re: *Ex Parte Presentation, Upper C-band (3.98 to 4.2 GHz), GN Docket No. 25-59; Expanding Flexible Use of the 3.7-4.2 GHz Band, GN Docket No. 18-122*

Dear Ms. Dortch:

Throughout the Federal Communications Commission’s (“FCC”) Upper C-band (3.98-4.2 GHz) proceeding, CTIA and its members have remained laser-focused on two goals for FCC action: (i) identifying and auctioning as much Upper C-band spectrum as possible for licensed, full-power terrestrial wireless broadband service by the July 2027 statutory deadline; and (ii) ensuring timely access to the spectrum so Upper C-band licensees can put the spectrum to work for the benefit of American consumers, enterprises, and the U.S. economy. The proceeding involves multiple interests and moving parts, including issues of coexistence between 5G deployments and radio altimeters operating in the 4.2-4.4 GHz band.

Last fall, wireless and aviation stakeholders met with FCC staff to describe the industries’ work together “to establish a safe but aggressive timeline and technical parameters to enable the expansion of the upper C-Band for wireless broadband use[.]”¹ The two industries reached consensus on nearly all relevant technical issues for purposes of wireless operations in Upper C-band spectrum, including full-power use of spectrum up to 4160 MHz, among other parameters. The parties highlighted areas where additional work was ongoing to achieve consensus positions, such as on the analysis of spurious emissions from Upper C-band 5G operations into the 4.2-4.4 GHz band. Since then, key aviation stakeholders have informed the FCC that “retrofits of radio altimeters on the vast majority of the in-service mainline fleet and a significant portion of the regional fleet could be accelerated and completed by the end of 2029,” and “[r]adio altimeter

¹ Letter from Dorothy B. Reimold, Aerospace Industries Association, et al., to Marlene H. Dortch, Secretary, FCC, GN Docket No. 25-59 (filed Oct. 2, 2025) (“Joint Letter”).



replacements for the remainder of the mainline and regional fleets could be completed by the end of 2030.”²

The FCC and the Federal Aviation Administration (“FAA”) are now deep into their parallel rulemakings—the former to set licensing, service, and technical rules for Upper C-band wireless services and the latter to set a timeline for the aviation industry’s upgrade to more interference-tolerant, next-generation radio altimeters. The FAA’s rulemaking shows that the next-generation radio altimeters are far more resilient and advance the coexistence environment, delivering a 200x improvement in signal tolerance as compared to today’s radio altimeters. These next-generation radio altimeters can tolerate increased spurious emissions within the 4.2-4.4 GHz band. CTIA filed a White Paper with the FAA and FCC offering a sliding scale emission limit in lieu of the FAA’s static coexistence model and proposing more realistic modeling values, which would further improve the coexistence case while continuing to ensure the FAA will meet its safety mission.³ Some aviation interests, meanwhile, continue to seek more significant FCC limits on spurious emissions into the 4.2-4.4 GHz band.

At this juncture, and in light of our dual goals for repurposing and auctioning as much Upper C-band spectrum as possible *and* timely access for new services, CTIA supports adoption of an FCC spurious emission rule, applicable to both Upper and Lower C-band wireless services, whereby licensees would choose to comply with either a -28.4 dBm/MHz radiated limit or a -46 dBm/MHz conducted limit for base station spurious emissions from the Lower and Upper C-band into the 4.2-4.4 GHz band.

This solution is more restrictive than warranted but will advance robust 5G. CTIA urges adoption specific to the Lower and Upper C-bands, given the exigencies of the current circumstances. This solution assumes adoption of technical rules consistent with the October 2, 2025, Joint Letter, including full-power wireless use up to at least 4140 MHz, expiration of all of the terms and conditions of the voluntary commitments for the Lower C-band, and grandfathering existing Lower C-band deployments under any future framework. Under this scenario, the

² Letter from Timothy White, Aerospace Industries Association, et al., to Marlene H. Dortch, Secretary, FCC, GN Docket No. 25-59, at 1 (filed Mar. 26, 2026).

³ See *Upper C-Band and Radio Altimeter Coexistence Model Inputs*, CTIA (Mar. 9, 2026), *attached to* Comments of CTIA, FAA-2025-5666 (filed Mar. 9, 2026); Letter from Scott K. Bergmann, Senior Vice President, Regulatory Affairs, CTIA, to Marlene H. Dortch, Secretary, FCC, GN Docket No. 25-59, Attach. (filed Mar. 13, 2026).



undersigned CTIA nationwide provider members are prepared to extend the voluntary commitments until the FCC's initial date for licensees' access to Upper C-Band spectrum.

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Pursuant to Section 1.1206 of the FCC's rules, a copy of this letter is being filed in ECFS. Please do not hesitate to contact the undersigned with any questions.

Sincerely,

/s/ Scott K. Bergmann

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