

**Before the
Federal Communications Commission
Washington, DC 20230**

In the Matter of)
)
Expanding Flexible Use of the 3.7 to 4.2) GN Docket No. 18-122
GHz Band)
)

**REPLY OF
NTCA–THE RURAL BROADBAND ASSOCIATION TO OPPOSITIONS TO PETITION
FOR RECONSIDERATION BY CHARTER COMMUNICATIONS, INC.**

NTCA–The Rural Broadband Association (“NTCA”)¹ hereby submits this Reply to the Oppositions to Petition for Reconsideration filed by Charter Communications, Inc. (“Charter”) in the above-referenced proceeding.² Charter urged the Commission to adopt rules, or a mandate, that would require C-Band flexible use licensees to coordinate with Citizens Broadband Radio Service (“CBRS”) licensees. Several NTCA member companies serving rural areas have indicated their intent to participate in the upcoming CBRS auction. To ensure that the spectrum CBRS spectrum is fully utilized and realizes its potential, it is essential that CBRS licensees have assurances in the form of a mandate or rules that will require the large carrier C-Band licensees to address and coordinate interference concerns.

¹ NTCA represents approximately 850 independent, community-based telecommunications companies and cooperatives and more than 400 other firms that support or are themselves engaged in the provision of communications services in the most rural portions of America. All NTCA service provider members are full service rural local exchange carriers (“RLECs”) and broadband providers, and many provide fixed and mobile wireless, video, satellite and other competitive services in rural America as well.

² Petition for Reconsideration of Charter Communications, Inc., GN Docket No. 18-122 (May 26, 2020) (“Petition”).

Specifically, Charter urged the Commission to *require* C-Band flexible use licensees “to make Time Division Duplex (“TDD”) synchronization available to Citizens Broadband Radio Service (“CBRS”) licensees and users (collectively, “operators”) upon request.”³ The Commission’s Order supports the need for C-Band licensees to coordinate with CBRS licensees, but does not make such coordination mandatory. Those filing Oppositions to Charter’s Petition objected to a mandate to coordinate interference, and instead requested that the Commission and CBRS licensees trust them to “do the right thing” if any interference should occur.⁴ The companies also assured the Commission both in their Oppositions and in earlier filings that they will coordinate with CBRS licensees to resolve interference issues as needed. Notably, none of these companies nor the Commission dispute Charter’s demonstration that, without TDD synchronization between CBRS licensees and adjacent C-Band licensees, CBRS base stations will “reduce the coverage of the CBRS base station and diminish its ability to communicate with CBRS user equipment to maintain the required user experience.”⁵

Given the fact that neither the Commission nor those opposing Charter’s Petition challenge Charter’s demonstration that TDD synchronization is essential to avoid C-Band interference with CBRS licensees operating in the adjacent band, combined with assurances from those opposing Charter’s Petition that C-Band licensees will resolve interference issues through a working group,⁶ NTCA urges the Commission to adopt rules that require C-Band licensees to

³ *Id.* at p. 1 (emphasis added).

⁴ *See, e.g.*, Verizon Opposition to Petitions for Reconsideration, GN Docket 18-122 (June 26, 2020), p. 6.

⁵ Petition at p. 5.

⁶ *See* CTIA Opposition to Petitions for Reconsideration, GN Docket 18-122 (June 26, 2020), pp. 5-6.

synchronize TDD operations with any adjacent CBRS licensee to avoid interference to the existing CBRS operations. Such a rule would avoid Commission staff time having to be devoted to review and then act on any interference complaints, including the real possibility of consumer complaints resulting from degraded service.⁷ Even more significantly, while the working group and/or the Commission spend time reviewing and discussing interference concerns and complaints, the interference will likely be ongoing, harming not only CBRS licensees but also the consumers who have come to rely upon the service(s) offered by CBRS licensees. Some of these consumers have no other option for broadband service in their community and thus are dependent upon the service offered by their CBRS provider.⁸ To diminish these consumers' essential service for any length of time is unnecessary due to the fact that the Commission is aware of the potential for interference and can require C-Band licensees to coordinate with CBRS providers in advance.

The CBRS spectrum offers providers and consumers to offer and receive essential broadband service as well as new, innovative uses. The Commission should not leave to chance the possibility that such services will be diminished due to a failure to adopt a rule *requiring* adjacent band C-Band licensees to conduct TDD synchronization when the Commission and those participating in the instant proceeding all agree that, without such coordination, interference will happen and will harm CBRS operations throughout the band.

⁷ Charter pointed out in its Petition that CBRS licensees are using the spectrum to “advance wireless competition and broadband deployment” and, without TDD synchronization, CBRS operations will likely suffer “both coverage loss and throughput reduction....” Petition at pp. 2, 4.

⁸ See *e.g.*, Letter from Brian Ford, Director of Industry Affairs, NTCA – The Rural Broadband Ass’n, to Marlene H. Dortch, Secretary, WT Docket No. 18-353 (Nov. 21, 2019).

Respectfully submitted,



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