Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of:	)	
	)	
Unleashing Unlicensed Spectrum for Direct-to-Device	)	ET Docket No. 26-169
	)	
	)	

COMMENTS OF THE NATIONAL ASSOCIATION OF BROADCASTERS

The National Association of Broadcasters (NAB)[1] submits these comments in response to the above-captioned Notice of Proposed Rulemaking (NPRM).[2] NAB does not object to authorizing additional services in the 2.4 GHz band on a secondary basis, provided such operations do not cause harmful interference to incumbent licensed services. In accordance with longstanding licensing and allocation policies, new secondary operations must remain subject to applicable interference protection obligations with respect to primary licensed services operating in the same band.

The NPRM proposes to add a footnote allocation for the mobile satellite service (MSS) in the Earth-to-space direction in the 2400–2483.5 MHz band, but it does not address the primary, co-channel licensed services operating in the 2450–2483.5 MHz portion of that

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1 The National Association of Broadcasters (NAB) is the nonprofit trade association that advocates on behalf of free local radio and television stations and broadcast networks before Congress, the Federal Communications Commission and other federal agencies, and the courts.

2 *Unleashing Unlicensed Spectrum for Direct-to-Device*, Notice of Proposed Rulemaking, ET Docket No. 26-169, FCC 26-51 (rel. Aug. 7, 2026) (NPRM).

band.[3] While the NPRM does acknowledge some authorized services operating in this band, such as the Amateur Radio Service, it overlooks the Broadcast Auxiliary Service (BAS).[4]

Section 74.602(a)[5] of the Commission's rules designates 2450–2467 MHz as BAS Channel A08 and 2467–2483.5 MHz as BAS Channel A09. Although existing unlicensed operations have constrained some kinds of broadcaster use of these channels, they remain important for certain applications such as for airborne electronic newsgathering, for which alternatives such as bonded cellular systems are unavailable due to restrictions on airborne cellular operation.[6]

As of the date of this filing, the Commission's Universal Licensing System (ULS) database lists approximately 505 authorizations in the BAS on Channels A08 and/or A09. Most commonly, these BAS authorizations are for TV Pickup (TP) use (*i.e.*, electronic newsgathering), although ULS also shows authorizations for intercity relay (TI), studio-transmitter link (TS), and TV Translator relay (TT) use. Broadcasters are also permitted to use these frequencies on an as-needed, short-term basis, up to 720 hours annually under Section 74.24 of the Commission's Rules without prior authorization.[7]

Existing secondary operations in the 2.4 GHz band have already demonstrated the potential for interference to BAS operations. Authorizing MSS transmissions from many mobile devices operating without frequency coordination would further increase that risk. Accordingly, should the Commission decide to proceed with the proposed footnote allocation for MSS

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3 NPRM ¶¶ 14, 19.

4 NPRM n. 85.

5 47 C.F.R. § 74.602(a).

6 47 C.F.R. § 22.925.

7 47 C.F.R. § 74.24.

operation in the band that includes 2450–2483.5 MHz, NAB urges it to expressly recognize the incumbent BAS operations and reaffirm that MSS operations must not cause harmful interference to those services. The Commission should also make clear that MSS operators bear responsibility for promptly resolving harmful interference, including ceasing transmissions when necessary.

Respectfully submitted,

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