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

In the Matter of	)	
	)	
Petition for Rulemaking in the Matter of Enabling	)	WT Docket No. 24-240
Next-Generation Terrestrial Positioning,	)	RM-11989
Navigation, and Timing and 5G: A Plan for the	)	
Lower 900 MHz Band (902-928 MHz)	)	

COMMENTS OF
THE NATIONAL ASSOCIATION OF BROADCASTERS

The National Association of Broadcasters (NAB)[1] submits these brief comments in response to the Public Notice ("Notice")[2] seeking comment on the above-captioned Petition for Rulemaking filed by NextNav Inc.[3] Although NAB takes no position on the proposal to reconfigure this band, NAB wishes to correct the Notice's assertion that NextNav's solution "is the only viable solution for a nationwide terrestrial [positioning, navigation, and timing (PNT)] system to complement GPS."[4] To the contrary, a number of entities have proposed solutions for terrestrial PNT capability. Notably broadcasters have been actively developing and testing

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[1] 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] *Wireless Telecommunications Bureau and Office of Engineering and Technology Seek Comment on NextNav Petition for Rulemaking*, Public Notice DA 24-776, WT Docket No. 24-240, RM-11989 (Rel. August 6, 2024) (Notice).

[3] *Petition for Rulemaking of NextNav Inc., In the Matter of Enabling Next-Generation Terrestrial Positioning, Navigation, and Timing and 5G: A Plan for the Lower 900 MHz Band (902-928 MHz)*, April 16, 2024 (NextNav petition). See also Letter from Robert Lantz to Ms. Marlene H. Dorch, *Rules supplement to NextNav Inc. petition for rulemaking*, June 7, 2024.

[4] See Notice at 2.

the use of ATSC 3.0 to meet this critical national security, economic, and public safety need within their existing licensed operations since 2021.[5] The Broadcast Positioning System (BPS) uses features of the ATSC 3.0 standard to deliver precise timing information within the ATSC 3.0 broadcast signal. When compared to the precise known locations of television transmitters, this timing information can be used in a manner akin to GPS to provide highly accurate PNT capability. NAB has been working with government agencies, including the National Institute of Standards and Technology (NIST) and the Department of Transportation (DOT), in the development and testing of this solution. In April 2024, the National Space-Based PNT Advisory Board identified ATSC 3.0 BPS as one of only four systems capable of providing both time source and time transfer capabilities.[6]

Again, NAB does not oppose the development of additional complementary terrestrial PNT solutions. We want to ensure, however, that any subsequent consideration also understands that there are other viable terrestrial PNT solutions in the marketplace, including BPS. We look forward to working with the Commission to ensure the safety and security of our nation's PNT infrastructure.

Respectfully submitted,

NATIONAL ASSOCIATION OF BROADCASTERS
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[5] Tariq Mondal, Robert Weller, and Sam Matheny, *Broadcast Positioning System (BPS) Using ATSC 3.0,* Proceedings of the 2021 NAB BEIT Conference (October 2021), https://www.nab.org/bps/Broadcast_Positioning_System_Using_ATSC30.pdf.

[6] See Logan Scott and Scott Burgett, *Augmenting GPS for Critical Infrastructure, prepared for Space-Based Positioning Navigation and Timing National Advisory Board meeting* (April 2024), https://www.gps.gov/governance/advisory/meetings/2024-04/pta-augment.pdf at 23. The other identified systems were Galileo, Satelles, and eLoran.

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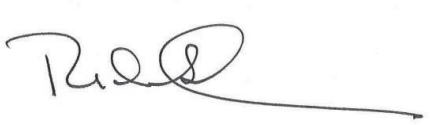

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September 5, 2024