

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

In the Matter of	)	
	)	
Unlicensed Use of the 6 GHz Band	)	ET Docket No. 18-295
	)	
Expanding Flexible Use in Mid-Band Spectrum	)	GN Docket No. 17-183
Between 3.7 and 24 GHz	)	

**PETITION FOR RECONSIDERATION OF  
THE NATIONAL ASSOCIATION OF BROADCASTERS**

Pursuant to Section 1.429<sup>1</sup> of the Commission's Rules, the National Association of Broadcasters (NAB)<sup>2</sup> respectfully seeks partial reconsideration of the Third Report and Order in the above-captioned proceeding,<sup>3</sup> in which the Commission expands unlicensed very low power (VLP) device operation in the entire 6 GHz band. NAB supports the Commission's efforts to expand opportunities for spectrum use, including unlicensed use of the 6 GHz band. Mid-band spectrum is a valuable resource and the Commission should strive to enable a variety of beneficial uses, including both licensed and unlicensed operations. NAB has not objected to making the vast majority of this band available for unlicensed use by VLP devices, including the majority of the spectrum licensed to broadcasters for electronic newsgathering operations. However, the Order declined to adopt NAB's very limited proposal for a temporary

---

<sup>1</sup> 47 C.F.R. § 1.429.

<sup>2</sup> 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.

<sup>3</sup> *Unlicensed Use of the 6 GHz Band; Expanding Flexible Use in Mid-Band Spectrum Between 3.7 and 24 GHz*, Third Report and Order, ET Docket No. 18-295, GN Docket No. 17-183, FCC 23-86, 90 FR 11373 (March 6, 2025) (Third Report and Order).

reservation of a mere 55 MHz at the top of the band for exclusive licensed use or to provide any other meaningful safeguard against harmful interference. Instead, in a rush to give away the maximum amount of free spectrum to Big Tech, the Order abandons a basic premise of unlicensed operation – that it is “subject to the condition[] that no harmful interference is caused[].”<sup>4</sup>

In numerous filings in the record of this proceeding, NAB has demonstrated that there are myriad circumstances in which interference may occur.<sup>5</sup> NAB has also identified methodological flaws in the studies presented by the proponents of this technology.<sup>6</sup> As NAB conceded, the interference risk posed by any particular unlicensed device is low, but if mobile devices using these bands become as popular as its proponents predict, the likelihood that one or more such devices is in close proximity to a licensed BAS receiver increases.<sup>7</sup> It is this “unlikely” scenario that concerns broadcasters. In the aggregate, broadcasters’ ability to rely on these bands to provide live coverage of newsworthy events will be undermined if there is no meaningful way to prevent or mitigate such interference expediently. And, the Commission has established no such mechanism.

While the Order asserts that “the Commission also remains committed to resolving harmful incidents in the unlikely possibility that they occur,”<sup>8</sup> it provides no explanation for how the Commission would fulfill that commitment. Even if a broadcaster could conclusively pinpoint the source of interference to a particular VLP device, the Commission has provided

---

<sup>4</sup> 47 C.F.R. § 15.5(b).

<sup>5</sup> NAB Comments at 4-10, ET Docket No. 18-195, GN Docket No. 17-183 (March 24, 2024).

<sup>6</sup> Letter from Richard Kaplan to Marlene Dortch, ET Docket No. 18-295, GN Docket No. 17-183 (October 30, 2024).

<sup>7</sup> *Id.*

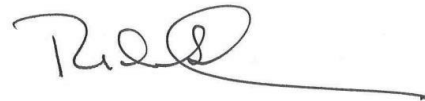
<sup>8</sup> Third Report and Order at ¶ 28.

no mechanism with which a licensed user could force that device to stop transmitting or move to another frequency. The broadcast would be over long before any kind of enforcement action could even commence.

For the reasons above, NAB respectfully requests that the Commission reconsider its approach to protecting licensed users from harmful interference in this band, and at a minimum reserve the right to de-authorize unlicensed operation in a portion of this band if NAB's concerns about harmful interference prove correct.

Respectfully submitted,

**NATIONAL ASSOCIATION OF  
BROADCASTERS**  
1 M St, SE  
Washington, DC 20003  
(202) 429-5430

A handwritten signature in dark ink, appearing to read "Rick Kaplan", with a long horizontal line extending to the right.

---

Rick Kaplan  
Alison Martin  
Robert Weller

April 7, 2025