



Meredith Attwell Baker

November 11, 2021

Mr. Brian Deese, Director  
National Economic Council  
The White House  
1600 Pennsylvania Avenue, N.W.  
Washington, D.C. 20500

Dear Director Deese:

After 17 years of global study, a multi-year public rulemaking proceeding, and interagency dialogue across all relevant federal agencies, in 2020 the Federal Communications Commission (FCC) determined that 5G wireless services in C-Band spectrum can coexist safely with aircraft operations. This finding aligns with today's 5G experience in nearly 40 other countries, where C-Band 5G spectrum is deployed and planes land safely every day without any evidence of harmful interference. The U.S. wireless industry is poised to deploy this spectrum in January to lead the world in 5G technology and, according to a recent Boston Consulting Group report, bring 4.5 million new U.S. jobs and \$1.5 trillion to the economy by 2030. On behalf of the U.S. wireless industry and the millions of Americans relying on those services every day, the Administration should reject further calls to delay C-Band 5G services.

Aviation safety is critically important. It is also not at risk due to C-Band 5G operations because there is no credible engineering evidence or real-world interference incidents to warrant delay in 5G deployment. The sole basis for the aviation community's advocacy is an aviation industry association report released late last year asserting interference risks to aviation altimeters, but a review of the test parameters shows significant flaws and inconsistencies and raises serious questions about the report's veracity. If those test conditions were accurate, altimeters in the United States would be functioning improperly today, even in the absence of 5G deployments.

Last week, the Federal Aviation Administration (FAA) issued a Special Airworthiness Information Bulletin (SAIB) stating only that this aviation industry association report "is under review." The SAIB offered no findings regarding the validity of the report and provided no engineering analysis or scientific basis in support of the risks it references. The SAIB however did acknowledge substantial evidence of the ability of wireless and aviation operations to successfully and safely coexist. In fact, the SAIB observed that "[t]here have not yet been proven reports of harmful interference due to wireless broadband operations internationally . . ." It recognized that in the U.S., mobile broadband commercial services operate in the 3.55-3.7 GHz band, just at the lower edge of the C-Band, "with no known issues for altimeters to date."

Dozens of countries have launched 5G in the C-Band without interference, including at similar frequencies and power levels, and in some instances in frequencies that are closer to aviation operations than C-Band 5G spectrum in the U.S. Just by way of example tens of thousands of 5G base stations have been deployed in Japan with just 100 megahertz separation to the altimeter operations as compared to the minimum 220 megahertz separation permitted in the U.S., or the 400 megahertz separation planned for the first tranche of C-Band spectrum. The U.S. aviation industry flies daily to Japan and all of these other countries without incident. It is only when operations in the U.S. are set to begin that White House engagement is sought in a highly irregular and press-focused manner.



Live flight testing has also confirmed that C-Band 5G operations safely coexist today with radio altimeter operations. This includes testing conducted by the French military using a helicopter and an active 5G base station, as well as tests by the Norwegian Communications Authority using an active 5G base station at Bergen-Flesland Airport with several different aircraft approaching. In each of these instances, there was no interference to altimeter operations.

The lack of interference between C-Band deployments and aviation altimeters comes as no surprise to spectrum experts. In 2020, after a multi-year review with public filings by the aviation and wireless industries, the nation's expert agency on spectrum matters, the FCC, issued an order to transition the lower portion of the C-Band (3.7-3.98 GHz) to 5G based on its own technical assessment that 5G and aviation can safely co-exist without interference. The minimum 220 megahertz separation between C-Band deployments and aviation altimeters was more than double the amount of separation called for by some in the aviation industry itself.

Second-guessing the FCC's determination here after so much investment has already been made and risking our international standing as a leader on 5G when no actual interference has been shown is shortsighted. Moreover, further delay imposed on an industry that paid billions of dollars for access to the spectrum—including additional funds directed at achieving early access—creates uncertainty around future auctions, and disincentivizes companies from participating going forward, which could significantly impact the nation's ability to pay for much-needed federal initiatives, like the recently-passed bipartisan infrastructure bill.

The United States needs both innovative 5G wireless services and safe aviation. Other nations have proven that these are mutually compatible goals in the C-Band. The wireless industry is eager to accelerate the benefits that 5G will bring to U.S. consumer welfare, to job creation and the economy, and to our global competitiveness in a manner that ensures safe flights. We ask the Administration to reject calls for further delay in C-Band 5G, and instead, direct the FAA and the aviation industry to be willing partners in advancing these shared goals.

Sincerely,

Meredith Attwell Baker  
President & CEO

cc: Bharat Ramamurti  
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