

December 16, 2022

**Via ECFS**

Ms. Marlene Dortch  
Secretary  
Federal Communications Commission  
45 L Street NE  
Washington, DC 20554

Re: Public Notice, Federal Communications Commission; Amendment of Section 15.255 of the Commission's Rules; ET Docket No. 21-264 (June 22, 2021)

Dear Ms. Dortch:

The undersigned organizations write requesting that the Federal Communications Commission's ("Commission" or "FCC") revise rules to enable new technological applications in the unlicensed 60 GHz band,<sup>1</sup> which would create opportunities for a wide range of users to utilize the band, including for airborne and ground radar deployments, gaming, immersive reality, and other communications devices.

The current rules under Section 15.255 limit the innovative potential of the 60 GHz band. In particular, we urge the Commission to modify the band's current restrictions to allow use of the band for low-altitude (i.e. 400 feet AGL and below) drone operations. Authorizing the use of 60 GHz radar technologies on drones would enhance safety for drone operations and provide significant economic and societal benefits for the American public and the business community.<sup>2</sup> Specifically, allowing the use of this band for low-altitude drone operations would enable the development of systems to sense and avoid obstacles and provide situational awareness.<sup>3</sup> This would help enhance aviation safety and reduce the risk to both people and property on the ground and other airspace users.

In adopting a final rule modifying Section 15.255 for low-altitude drone operations and other innovative use cases, the Commission should be cognizant of other users and use cases in the 60 GHz band, for both incumbents and potential new

---

<sup>1</sup> *Amendment of Section 15.255 of the Commission's Rules*, Notice of Proposed Rulemaking, FCC 21-183, ET Docket No. 21-264 (July 14, 2021) ("NPRM").

<sup>2</sup> Comments of Association for Uncrewed Vehicle Systems International, Commercial Drone Alliance, and Small UAV Coalition, ET Docket No. 21-264 (filed Nov. 21, 2022).

<sup>3</sup> Comments of Amazon.com, ET Docket No. 21-264 (filed Sept. 20, 2021).

entrants.<sup>4</sup> Grounded in sound data and analysis, the Commission should ensure that enhancing flexibility for the 60 GHz is coupled with necessary technical rules that allow for the safe and efficient use of the band by new and existing users. We strongly support the Commission's efforts to develop rules that accommodate a diverse range of use cases and urges the Commission to encourage relevant stakeholders to find an appropriate balance to ensure the efficient and innovative use of the 60 GHz band.

Thank you for considering our comments on this proceeding. It is crucial that the Commission facilitate the development and use of novel technologies through sound spectrum policy. Please reach out to Matt Furlow at [mfurlow@uschamber.com](mailto:mfurlow@uschamber.com) with any questions regarding these comments.

Sincerely,

Consumer Technology Association  
CTIA  
Information Technology Industry Council (ITI)  
NetChoice  
TechNet  
U.S. Chamber of Commerce

---

<sup>4</sup> See Comments of the Alliance for Automotive Innovation, ET Docket No. 21-264 (filed Sept. 20, 2021); Comments of Facebook, Intel, and Qualcomm, ET Docket No. 21-264 (filed Sept. 20, 2021); Comments of Wi-Fi Alliance, ET Docket No. 21-264 (filed Sept. 20, 2021).