

October 29, 2024

The Honorable Maria Cantwell
Chair
Committee on Commerce, Science, & Transportation
U.S. Senate
Washington, D.C. 20510

The Honorable Ted Cruz
Ranking Member
Committee on Commerce, Science, & Transportation
U.S. Senate
Washington, D.C. 20510

The Honorable Cathy McMorris Rodgers
Chair
Committee on Energy & Commerce
U.S. House of Representatives
Washington, D.C. 20515

The Honorable Frank Pallone
Ranking Member
Committee on Energy & Commerce
U.S. House of Representatives
Washington, D.C. 20515

Dear Chair Cantwell, Chair McMorris Rodgers, Ranking Member Cruz, and Ranking Member Pallone:

Our organizations play a vital role in protecting the safety and security of American families and businesses. We are committed to ensuring that the technologies used to protect public safety and American families can continue to operate in a competitive environment that drives growth and innovation. This includes the millions of unlicensed part 15 devices that operate in the Lower 900 MHz Band, which include alarm, electronic access, and security camera technologies among other security and life safety equipment essential for protecting homes, small businesses, and critical infrastructure.

The Federal Communications Commission (FCC) has an established process to allow unlicensed part 15 devices to continue coexisting in this band by requiring Multilateration Location Monitoring Service (M-LMS) licensees to demonstrate through field tests that their systems do not cause unacceptable levels of interference to part 15 devices. FCC's non-interference requirements have supported the investment and innovation of millions of critical devices in the Lower 900 MHz Band because of the more robust operating environment that it provides.

On August 6, 2024, the Wireless Telecommunications Bureau and the Office of Engineering and Technology at the FCC released a public notice seeking comment on a petition for rulemaking from NextNav Inc., requesting that the FCC reconfigure the Lower 900 MHz Band and adopt new rules to enable the deployment of a 5G terrestrial positioning, navigation, and timing (TPNT) network. In addition to a reconfiguration of the band, NextNav asks the FCC to remove the current requirement that it not cause unacceptable levels of interference to Part 15 Devices.

These changes proposed by NextNav have the potential to cause significant costs and detriment to the broad range of individuals, businesses, and federal, state, and local government facilities that rely on the use of part 15 devices for their safety and security. NextNav has failed to prove that their technology would not significantly disrupt operations or cause adverse interference from crowding in the band, a worry that has been pointed out in the nearly 2,000 comments and reply comments to the proposal, representing a broad cross-section of industries that could be adversely impacted by this reconfiguration and rulemaking. The record reflects that the proposed disruption of the Lower 900 MHz band by NextNav's proposal could cost state and local governments, businesses and consumers tens of billions of dollars, as they would have to replace working devices unnecessarily.

NextNav argues that this risky proposal is necessary for the establishment of TPNT backup to GPS. However, commenters have pointed out that there are alternative PNTs in development that do not require intrusion or reconfiguration of the widely used Lower 900 MHz Band. As other alternatives exist, FCC should not feel obligated to roll back protections for millions of devices that require high reliability communication.

While a broad range of devices impacted by this proposal have uses for traffic control, flood warning systems, utility operations, and safety of schools, hospitals, and businesses, there are also devices impacted that are critical for the security, and protection of American life, such as Z-wave technologies that integrate smart home devices into security alarm systems; security cameras that provide real-time management or remote access; and electronic access control devices relied upon for public and community safety and security in residential, institutional, and commercial buildings.

We respectfully ask that you urge the FCC to consider the consequences of the NextNav proposal to these critical technologies in any Commission decision-making on the reconfiguration of the Lower 900 MHz Band. Our organizations stand ready to provide any additional information you and your staff may need as you consider this issue.

Sincerely,

ABA Alarm Company

ADT

Advanced Security Systems

AES Corporation

Alarm Innovations

ALARM21 Corporation

Allegion

All-Guard Alarm Systems, Inc.

AMAROK

Anchor Door Technologies, LLC

ASSA ABLOY Opening Solutions Americas

Axis Communications

Bay Alarm Company

Bosch Security Systems, LLC

Building Intelligence Inc.

California Alarm Association

Central Alarm Signal, Inc.

Convergint

DAQ Electronics LLC

Dayton Security Inc

Dehart Alarm Systems, LLC.

Dempsey Alarms

DictoGuard Security Alarm Systems, Inc.

Digital Monitoring Products

Doyle Security Systems, Inc.
DTect Security Services
EcoSmart Solutions & Security LLC
Electrical Signals
Electronic Security Association
Electronic Solutions
EMD LLC
Emergency24, Inc.
First Alarm
Georgia Security Systems, Inc.
Gotcha Security
Grand Central Station, Inc.
Grid Squared Systems
GSA Schedules, Inc.
Guardian Hawk Security
Haines Security Solutions
Hanwha Vision
HID Global Corporation
ICSS, Inc.
IDEMIA Public Security
Imperial Capital
Jade Alarm Co.
Johnson Controls
Keri Systems
LA Alarms
Lake Hickory Security
Louroe Electronics
M.C. Dean, Inc
MacGuard Security Advisors, Inc.
Militia Protection
Motorola
Multiguard Corporation
Observation Without Limits, LLC
Orion Entrance Control, Inc.
Platinum Tech Services, LLC
Pro Home Systems, Inc.
Protek Security and Fire Systems, Inc.
Reed Brothers Security
Robotic Assistance Devices
Sabre Integrated Security Systems, LLC
Safetrust

Security Engineering Associates, Inc.
Security Industry Association
Security Professionals
Sentry Alarms
Smartech Security, Corp.
Solid Security Services
Southern Sentry
Summit Fire Protection
Systems Distributers Inc.
Systems Integrations
Tech/Knowledge, Inc.
Tel-Tec Security Systems, Inc.
The Monitoring Association
Total Automation Group, Inc.
Total Connect Solutions, LLC
Tower Security
Ultrasafe Security
United Security & Communications, Inc.
Van Cleve & Associates, Inc.
Vector Security, Inc.
Verkada
Vision Security Solutions
Vivint LLC
Weaver Systems Inc.
Wesco
WI Security Association
ZeroEyes

Cc: Members of the Senate Committee on Commerce, Science, & Transportation
Members of the House Committee on Energy & Commerce