



Protect the Lower 900 MHz Band

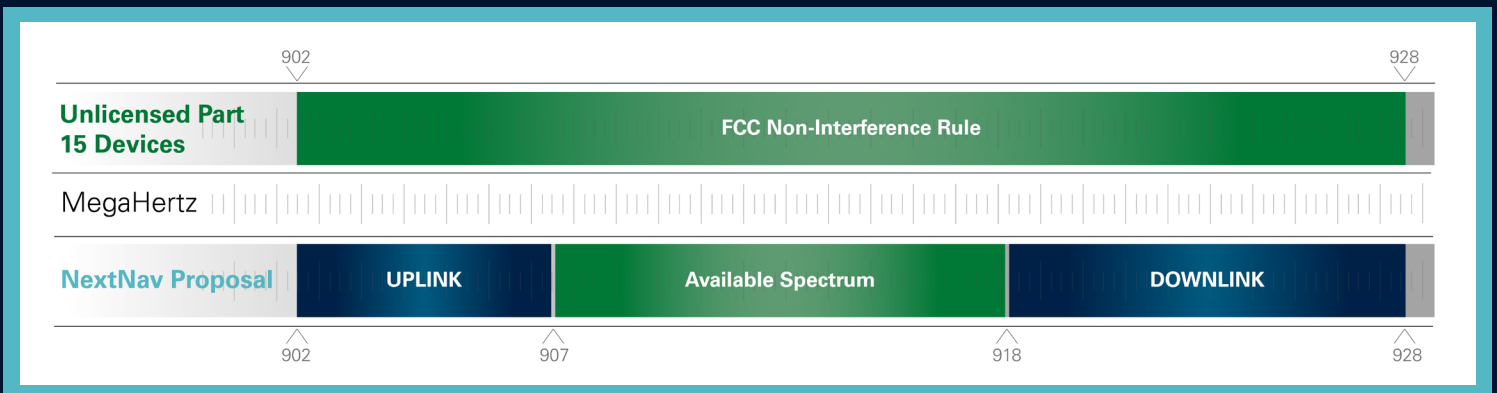
Maintain Access for Important Public Safety and Security Technologies

What Is the Lower 900 MHz Band?

A portion of the 900 MHz spectrum from 902-928 MHz, known as the “Lower 900 MHz Band” established under current FCC rules contains a vibrant ecosystem for unlicensed devices. This frequency range has been a catalyst for new technologies, where use does not require a special license if operated under FCC Part 15 rules. For years, these technologies have been able to coexist with licensees and thrive in the band, including a variety of low-power, radio frequency (RF) security & life safety devices such as consumer electronics and appliances, wireless alarm systems, smart home equipment, electronic access control devices and others.

What Are the Proposed Changes to the Band?

A Position, Navigation, and Timing (PNT) service company known as NextNav is urging the FCC to reallocate portions of the Lower 900 MHz Band for its use, radically altering the spectrum and forcing existing users into roughly 40% of the band. Additionally, NextNav seeks to remove an FCC rule that has contributed to the thriving, innovative environment for unlicensed use of the band for decades, getting rid of a requirement that they not have to demonstrate through actual field tests that they not cause harmful interference to Part 15 devices.



How Will the NextNav Proposal Affect You?

The Lower 900 MHz band is heavily utilized by security, alarm system communication, and electronic access control devices that would be rendered useless by NextNav’s proposed high-power usage in the band. These devices include, but are not limited to:

- Alarm Systems
- Automatic Door Locks
- Smoke Detectors
- Carbon Monoxide Detectors
- Home Automation Security Solutions
- Security Cameras
- Panic Buttons
- Gun Shot Detection
- Electronic Access Control Devices
- Encrypted Communication Devices
- Intrusion Sensors
- Glass Break Detectors
- Fire Alarm Pull Stations
- Medical “Call” Pull Cords
- Medical Pendants
- Temperature Sensors
- Fall Pendants
- Remote Keypads
- Smart Locks
- Security Control Panels

What Will the NextNav Proposal Cost?

Given the vital life safety functions of these devices, it is crucial that their communications work reliably as engineered, as even temporary interference can result in gaping security vulnerabilities. If the NextNav proposal is implemented, millions of consumers will find that the devices that protect their homes, businesses, and neighborhoods must be replaced entirely. The cost of replacing and retooling security devices alone in this bandwidth will reach billions of dollars. But the potential costs to public safety will be much more devastating when high-powered interference causes security vulnerabilities across a range of devices that are relied upon daily to keep lives and property safe.

SIA members are committed to ensuring that security devices and technologies provide reliable, critical life safety services for users. We support the protection of unlicensed use in this band so that the technologies used to protect public safety and American families can continue to operate in a competitive environment that drives growth and innovation. The FCC should deny the NextNav petition and maintain their protections for shared use in the Lower 900 MHz Band.

Opposition to the NextNav Proposal is Widespread



"NextNav's proposal would substantially interfere with electronic tolling operations for bridges, tunnels, and toll roads by shifting and compressing critical bandwidth by more than 20%."

- International Bridge, Tunnel & Turnpike Association (IBTTA)



"Rearranging this band would have ripple effects on a significantly large base of installed equipment requiring product recalls, restructuring of existing customer networks, and implementing significant changes to existing utility rate bases that serve as the basis for billing customers' electricity usage."

- National Electrical Manufacturers Association



U.S. Chamber of Commerce

"The Lower 900 MHz band is widely used by customers of broad sectors of the economy - including operations involving retail, critical infrastructure, aviation, electrical utilities, oil, natural gas, railroads, highway tolling, broadband, smart home devices, security, public safety, and supply chain. The record in response to the Public Notice establishes that the harm outweighs the benefits if the NextNav Petition is approved."

- U.S. Chamber of Commerce

About SIA

SIA is a U.S. trade association representing more than 1,600 security solutions providers, ranging from large firms to locally owned and operated small businesses. Protecting our country, our citizens and our economy is the ultimate mission of the security industry, which contributes over \$430 billion to the economy and provides more than 2.1 million jobs in the United States.

Thriving Environment Throughout the Lower 900 MHz Band

STANDARD Z-WAVE TECHNOLOGIES

Z-WAVE LONG RANGE TECHNOLOGIES

LORA UPSTREAM CHANNELS

LORA DOWNSTREAM CHANNELS

RAIN RFID GLOBAL STANDARD USAGE

908-916 MHz

912-920 MHz

902-914 MHz

923-927 MHz

860-930 MHz

902

928



>100 MILLION

Z-WAVE DEVICES IN THE UNITED STATES



10S OF MILLIONS

OF DEVICES AND MILLIONS
OF GATEWAYS ACROSS THE COUNTRY



>80 BILLION

RFID TAG CHIPS DEPLOYED
IN THE UNITED STATES



>85 MILLION

SECURITY CAMERAS
IN THE UNITED STATES

References

Petition for Rulemaking of NextNav, Inc., WT Docket No. 24-240 (filed Apr. 16, 2024) (NextNav Petition)

Letter from Robert Lantz, General Counsel, NextNav Inc., to Marlene H. Dortch, Secretary, FCC, WT Docket No. 24-240 (June 10, 2024)

Wireless Telecommunications Bureau and Office of Engineering and Technology Seek Comment on NextNav Petition for Rulemaking, Public Notice, DA 24-776 (rel. Aug. 6, 2024) (Public Notice)

Comments of the Z-Wave Alliance, WT Docket No. 24-240 (Sept. 5, 2024).

Comments of the LoRa Alliance, WT Docket No. 24-240 (Sept. 5, 2024).

Joint Comments of RAIN Alliance Inc. & AIM Inc., WT Docket No. 24-240 (Sept. 5, 2024).

Reply Comments of U.S. Chamber of Commerce, et al., WT Docket No. 24-240 (Sept. 5, 2024).

Comments of the National Electrical Manufacturers Association, WT Docket No. 24-240 (Sept. 5, 2024).

Mark Muriello, Why the FCC Should Deny the Petition to Reorganize the Lower 900 MHz Band, Sept. 6, 2024, <https://www.ibtta.org/insights/why-fcc-should-deny-petition-reorganize-lower-900-mhz-band>

Analysis: NextNav's Claims of Non-Interference in the Lower 900 MHz Band, Comments of the Z-Wave Alliance, WT Docket No. 24-240 (Apr. 9, 2025).

International Bridge, Tunnel & Turnpike Association (IBTTA). "Protecting the lower 900 MHz Spectrum for Tolling and Transportation." IBTTA, Spring 2025, https://www.ibtta.org/sites/default/files/documents/Advocacy/IBTTA_900MHzSafety_031725_Ltr.pdf