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October 3, 2025

VIA ELECTRONIC FILING
Marlene H. Dortch
Secretary
Federal Communications Commission
45 L St NE
Washington, D.C. 20554

Re: Ex Parte, WT Docket No. 25-110

Dear Ms. Dortch:

In its comments to the March 27, 2025, *Notice of Inquiry* (*NOI*) in the above-referenced docket, the Alliance for Telecommunications Industry Solutions' (ATIS) noted that its Synchronization Committee (SYNC) was in the process of preparing a technical report focusing on resilient timing architecture. ATIS is pleased to note that ATIS SYNC has completed its Technical Report on *Resilient Timing Architecture for 5G Communications Networks* (ATIS-0900006)[1]. The report addresses:

- GPS vulnerabilities affecting telecommunications infrastructure;
- Resilient timing architecture options for 5G networks;
- Technical specifications for Enhanced Primary Reference Time Clocks (ePRTC);
- Recommendations for autonomous time scale systems for long-term outage protection; and
- High Accuracy Time Transfer (HA-TT) implementation strategies.

The report represents the collaborative work of industry subject matter experts through ATIS SYNC and directly supports the Commission's inquiry into alternatives and complements to GPS for developing a "system of systems" approach to Positioning, Navigation, and Timing (PNT) technologies.

Please let us know if you have any questions or would like to schedule follow-up meetings to discuss this work.

Regards,

David Young
ATIS Vice President – Technology Policy and Government Relations

[1] Available at https://access.atis.org/higherlogic/ws/public/document?document_id=82898.