

**Before the  
Federal Communications Commission  
Washington, D.C. 20554**

In the Matter of	)	
	)	
Unleashing American Drone Dominance	)	GN Docket No. 26-74
	)	
Spectrum Rules and Policies for the Operation of Unmanned Aircraft Systems	)	WT Docket No. 22-323
	)	
Facilitating Opportunities for Advanced Air Mobility	)	WT Docket No. 24-629
	)	

**REPLY COMMENTS OF THE ALLIANCE FOR TELECOMMUNICATIONS  
INDUSTRY SOLUTIONS**

The Alliance for Telecommunications Industry Solutions (ATIS) hereby replies to the comments submitted in response to the Federal Communications Commission's (Commission) April 1, 2026, Public Notice in GN Docket No. 26-74; Notice of Proposed Rulemaking in WT Docket No. 22-323; and Notice of Proposed Rulemaking in WT Docket No. 24-629 (Notice).

**I. Introduction**

ATIS is a leading global standards development and technical planning organization that advances technical and operational standards for the information and communications technologies (ICT) sector. Its diverse membership spans key ICT stakeholders, including wireless, wireline, and VoIP service providers, equipment manufacturers, broadband providers, software developers, consumer electronics firms, public safety agencies, and internet service providers. As a founding partner and the North American Organizational Partner of the Third Generation Partnership Project (3GPP), ATIS plays a pivotal role in shaping global wireless specifications, including 4G LTE, 5G NR, and now 6G.

These comments reflect input from ATIS' Uncrewed Aerial Vehicles ("UAV") Initiative. Launched in 2017, this initiative considers applications of UAVs in telecommunication-related applications and the use of mobile cellular networks to provide communications and other services for UAVs. The group also provides a venue that members can use to coordinate their input to UAV-related standards topics and monitor the progress of work in 3GPP and other bodies. The ATIS UAV Initiative has published a number of white papers discussing the importance of UAVs for the mobile cellular industry, and the UAV-related capabilities incorporated into the 3GPP specifications and is considering how the existing specifications for UAV communications can be enriched to provide new features to improve the safety and operations of UAVs.

## **II. The Record Reflects Strong Industry Consensus on Cellular-Based UAS Integration**

The initial comments filed in this proceeding reflect a remarkable degree of industry alignment on several foundational questions. Commercial wireless networks operating over licensed, interference-protected flexible-use spectrum are the right platform for UAS operations at scale. CTIA, Ericsson, Qualcomm, Nokia, and others have made this case in technical detail, and ATIS concurs. The filed comments also establish clear consensus that legacy airborne restrictions in bands like 800 MHz Cellular and CBRS are outdated and should be lifted, 3GPP cellular technology in the skies leveraging mobile network and solutions like A2X/PC5 sidelink could provide the essential tactical deconfliction, and that Integrated Sensing and Communication (ISAC) technology offers a standards-based, interference-safe path forward on Counter-UAS detection.

One area that the initial record addressed only in general terms is the architecture for network-based electronic conspicuity that would allow cellular networks to actually function as an airspace situational awareness system, not merely as a connectivity pipe. ATIS believes this is a critical gap, and one that its members are actively working to fill.

## **III. ATIS's UAV Working Group Is Developing a Standards-Based Electronic Conspicuity Architecture**

ATIS's UAV Working Group is beginning work on a technical report on Universal Secure Electronic Conspicuity (USEC) that addresses precisely this gap. The USEC framework describes a dual-mode architecture combining MNO-based cellular connectivity in the skies as the primary electronic conspicuity layer along with PC5/A2X sidelink for tactical deconfliction and out-of-coverage resiliency. Central to the architecture is a defined network function — the USEC Function, or USECF — that aggregates position and identity data from transmitting aircraft and redistributes airspace situational awareness to all participating aircraft, regardless of which network operator they are connected to. The multi-MNO coordination model that underpins this function will be, to ATIS's knowledge, the most detailed treatment of this issue in any public forum to date.

The USEC work is being developed in alignment with the 3GPP UAS standardization roadmap drawing on Releases 17 and 18 aerial UE specifications and is designed expressly to satisfy the connectivity and identification requirements of the FAA's pending BVLOS rulemaking. ATIS anticipates completing the technical report later this year.

#### **IV. ATIS Offers to Engage the Commission as This Work Develops**

As the North American Organizational Partner to 3GPP and the convening body for the Next G Alliance, ATIS is positioned to serve as a bridge to the global standards development environment. The Commission's decisions in this proceeding on flexible-use band restrictions, the 5030 MHz band plan, experimental licensing frameworks, and C-UAS policy will shape whether the network-based conspicuity architecture the industry is building can actually be deployed in the United States.

ATIS stands ready to brief staff in the Wireless Telecommunications Bureau and the Office of Engineering and Technology on the USEC technical architecture as the work matures, and to provide more detailed technical guidance as the Commission develops its rules. ATIS also offers to facilitate structured engagement between the FCC, NTIA, FAA, and the 3GPP standards community on the UAS standardization roadmap and its policy implications.

#### **V. Conclusion**

The Commission has before it a strong record supporting cellular-based UAS integration. ATIS encourages prompt action on the consensus positions that record establishes. ATIS further offers its ongoing technical work on Universal Secure Electronic Conspicuity, and its institutional role in the global standards development process, as resources the Commission can draw on as this proceeding develops. We look forward to continued engagement.

Respectfully submitted,



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