

**Before the
Federal Aviation Administration
Department of Transportation
Washington, D.C. 20591**

In the Matter of	)	
	)	
Designation — Restrict the Operation of	)	Docket No. FAA-2026-4558;
Unmanned Aircraft in Close Proximity to a	)	Notice No. 26-03
Fixed Site Facility	)	RIN 2120-AL33
	)	
	)	

COMMENTS OF THE ALLIANCE FOR TELECOMMUNICATIONS INDUSTRY SOLUTIONS

The Alliance for Telecommunications Industry Solutions (ATIS) respectfully submits these comments in response to the Federal Aviation Administration's (FAA) Notice of Proposed Rulemaking (NPRM) on the designation of Unmanned Aircraft Flight Restrictions (UAFRs) near fixed site facilities.

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.

ATIS' Next G Alliance (NGA) is the preeminent North American authority on 6G technology, charged with advancing United States leadership in next-generation wireless networks.¹ The NGA's membership spans the full ecosystem required to deploy advanced network capabilities at national scale: carriers, vendors, universities, research institutions, and government partners. ATIS also convenes the ATIS Uncrewed Aerial Vehicles (UAV) Initiative, a dedicated program developing technical standards and policy frameworks for unmanned aircraft integration using mobile network infrastructure.²

¹ More information on ATIS' Next G Alliance can be found at <https://nextgalliance.org/>.

² More information on ATIS' Uncrewed Aerial Vehicles (UAV) Initiative can be found at <https://atis.org/initiatives/uncrewed-aerial-vehicles-uavs/>.

ATIS supports the FAA's objective of protecting critical infrastructure from the safety and security risks posed by unauthorized Unmanned Aircraft Systems (UAS) operations and commends the agency for its balanced approach to preserving airspace access for legitimate UAS operators. These comments identify two active ATIS workstreams with direct relevance to the questions the FAA has raised in this proceeding. ATIS stands ready to serve as an ongoing resource to the agency as the outcome of this rulemaking is implemented.

II. The Enforcement Challenge and the Role of the Mobile Network

The NPRM is candid about a fundamental limitation of the proposed framework: the UAFR is a legal designation, not a physical barrier. Law abiding UAS operators will comply with the restriction; the safety and security risk will flow from those who do not. The FAA explicitly acknowledges this and solicits comment on what technological or procedural requirements should govern UAS access within UAFRs, including how UAS operators should establish their credibility and whether requirements beyond Remote ID are appropriate.

ATIS submits that the mobile network is uniquely positioned to serve as a technology substrate for UAFR access management and enforcement support. Mobile Network Operator (MNO) infrastructure already covers virtually every fixed site facility likely to seek a UAFR in the United States. It offers network-authenticated identity, two-way communication, and persistent tracking capabilities that complement and, in key respects, improve upon broadcast-based identification systems. Remote ID is necessary but not sufficient for the UAFR access-control problem. As a broadcast protocol dependent on UAS operator compliance and local receiver infrastructure, it provides no network-authenticated identity verification and no real-time communication capability between a UAS operator and a facility.

Two ATIS workstreams are developing the standards and technical frameworks to realize the mobile network's potential in this context. Both are in the initial but meaningful stages, and ATIS submits them here to inform the FAA's awareness of this emerging work rather than to propose specific regulatory requirements at this time.

III. Universal Secure Electronic Conspicuity via Mobile Networks

ATIS' UAV Initiative has begun work on a framework for Universal Secure Electronic Conspicuity (USEC) using mobile networks. USEC is a dual-mode architecture in which MNO-based cellular connectivity serves as the primary layer for UAS identification, authorization, and tracking, with PC5/A2X direct sidelink communication providing a complementary channel where network connectivity may be limited. This work is aligned with the U.S. Department of Transportation's (DOT) Mobile Network Aviation Assessment Program (MNAAP), an effort assessing cellular technologies as the foundation for next-generation airspace conspicuity and deconfliction.

USEC is directly relevant to the questions the FAA has raised in this proceeding. The NPRM asks what information a UAS operator should provide to establish credibility and demonstrate

they are not a security threat, and whether there are additional technological requirements beyond Remote ID that should govern access through a UAFR. Network-authenticated identity, confirmed through the UAS operator's MNO, offers a meaningfully higher assurance signal than broadcast Remote ID alone, with the added benefit of leveraging infrastructure already in place at or near virtually every eligible facility in the country.

ATIS filed comments in the FCC's related "Unleashing American Drone Dominance" proceeding (GN Docket 26-74) introducing the USEC framework and will continue to advance it through standards development and government engagement. The work is promising but still maturing, and ATIS does not propose specific USEC-related regulatory requirements at this stage. We raise it here to ensure the FAA is aware of this development as it shapes the UAFR access framework and companion Advisory Circular guidance, and to signal ATIS' availability as a technical resource as the standards develop.

IV. ISAC-Enabled Sensing and Airspace Awareness

Integrated Sensing and Communication (ISAC) is a foundational capability of 6G networks that combines radar-like spatial sensing with wireless communications within a unified system. Rather than requiring separate sensing infrastructure, an ISAC-enabled network uses its existing radio access equipment to simultaneously communicate with connected devices and sense the surrounding environment -- detecting the presence, movement, and characteristics of objects within its coverage area, whether those objects are network-connected or not.

This capability is directly relevant to the UAFR enforcement challenge. USEC addresses cooperative UAS whose operators are flying in compliance with network-layer conspicuity requirements. ISAC addresses the broader airspace picture, including non-cooperative UAS that broadcast no identity signal or are operating without authorization. A non-cooperative drone is, by definition, the highest-risk scenario a UAFR is designed to address, and ISAC offers the prospect of persistent airspace awareness within and around a UAFR boundary without requiring facility-specific detection hardware.

The Next G Alliance launched the ISAC Data Initiative (ISAC-DI) in June 2026 to address one of the central practical challenges in realizing ISAC's value: how sensing data generated by 6G-enabled networks is synthesized, packaged, and delivered to operational decision-making systems in standardized, usable forms.³ Drone detection and tracking is a key use case for ISAC and the ISAC-DI will help ensure that the information obtained from MNO ISAC systems can be delivered effectively to agencies such as the FAA, the Department of Homeland Security, and the Department of War, who also have requirements for these capabilities.

As with USEC, ATIS raises the ISAC-DI here to inform the FAA's awareness of this work, not to propose specific regulatory requirements. The initiative has launched, and the standards for data

³ More information on the Next G Alliance ISAC Data Initiative (ISAC-DI) can be found at <https://nextgalliance.org/initiative/isac-data-initiative/>.

packaging, delivery interfaces, and interoperability are in development. ATIS anticipates that this work will become increasingly relevant to the UAFR framework as it progresses, and we welcome the opportunity to keep the FAA informed.

V. Conclusion and Request for Engagement

ATIS supports the UAFR rulemaking's core objectives and the FAA's balanced approach to protecting critical infrastructure while preserving legitimate airspace access. The mobile network represents a significant and underutilized resource for making UAFRs operationally effective. ATIS is actively working on projects that will make network-based conspicuity and airspace sensing interoperable and deployable at scale.

Both workstreams are at early stages, and ATIS is not in a position to propose specific regulatory requirements at this time. We respectfully request two acknowledgements of the FAA:

1. That the FAA take note of the USEC and ISAC-DI workstreams as they develop the companion Advisory Circular and implementation guidance for the UAFR framework, recognizing that network-based solutions are likely to become relevant to both access management and enforcement support as the technology matures; and
2. That the FAA engage with ATIS through the ATIS UAV Initiative and the Next G Alliance ISAC-DI so that agency staff can remain informed of progress and so that ATIS can ensure that its work is responsive to FAA's operational and regulatory requirements.

ATIS stands ready to brief FAA staff on these workstreams and serve as a technical resource as these standards are developed and mature.

Respectfully submitted,



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