EEI Edison Electric Institute
American Public Power Association — Powering Strong Communities
LPPC Large Public Power Council
NRECA America's Electric Cooperatives

May 28, 2026

Via Electronic Filing

Marlene H. Dortch, Secretary
Federal Communications Commission
45 L Street, NE
Washington, DC 20554

Re: FCC Public Notice, Unleashing American Drone Dominance, DA 26-314, GN Docket No. 26-74, WT Docket Nos. 22-323, and 24-629 (Apr. 1, 2026) (Public Notice or PN).

Dear Ms. Dortch:

The Edison Electric Institute (EEI), American Public Power Association (APPA), Large Public Power Council (LPPC), and the National Rural Electric Cooperative Association (NRECA) (collectively, "the Associations") respectfully submit this letter in the above referenced proceeding to urge immediate Commission action to enable scalable unmanned aircraft systems ("UAS") deployment through a multi-band, multi-network framework that preserves aviation safety, protects critical infrastructure, and accelerates near-term deployment opportunities.

I. Summary

The record supports immediate Commission action to enable scalable UAS deployment through a multi-band, multi-network framework that preserves aviation safety, protects critical infrastructure, and accelerates near-term deployment opportunities.

The record demonstrates broad agreement that achieving American drone dominance will require a balanced, safety-first, multi-band, and multi-network communications architecture, not reliance on any single spectrum band or network model. Commenters across the record recognize that scalable UAS deployment will depend on complementary commercial wireless networks, private broadband systems, aviation spectrum, and emerging technologies, each suited to distinct operational needs.

While stakeholders emphasize different aspects of UAS communications, including commercial network scalability, aviation-grade safety requirements, and infrastructure reliability, the record reflects a convergence rather than a conflict. These perspectives address distinct but complementary elements of a layered communications architecture, and the Commission's task should be to enable their coordinated use within a coherent, risk-calibrated framework.[1] These conclusions are reinforced by the recognition that UAS communications are

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[1] See Comments of Association for Uncrewed Vehicle Systems International, GN Docket No. 26-74 et al., at 5–6 (filed May 18, 2026) (AVUSI Comments) (explaining that no single technology, spectrum band, or network architecture can support all UAS operations); Reply Comments of Aerospace Industries Association et al.,

not solely a matter of broadband connectivity, but part of an integrated communications, navigation, and surveillance ("CNS") ecosystem required for safe and scalable integration into the National Airspace System ("NAS").[2] Commission policy must therefore enable not only connectivity but the full set of systems necessary to support aviation safety and infrastructure-scale operations.

Consistent with the record, the Commission should adopt policies that:

- Enable diverse and complementary network architectures.
- Expand spectrum access through risk-based frameworks.
- Advance near-term spectrum opportunities.
- Modernize licensing and deployment processes.

Electric utilities represent one of the largest and most immediately scalable opportunities for UAS deployment. Enabling utilities to scale UAS operations will accelerate domestic deployment while strengthening grid resilience, emergency response, and national security.

II. The record confirms that a multi-network approach is necessary

Critical infrastructure operators require controlled network environments, predictable interference conditions, and resilience during emergency scenarios. At the same time, aviation integration requires CNS capabilities that extend beyond broadband connectivity. Commercial networks therefore constitute an important but partial solution. The Commission should then explicitly endorse a multi-layer architecture incorporating licensed commercial networks, private infrastructure networks, aviation-specific spectrum, and emerging solutions including high-altitude platforms and direct air-to-air communications.

The record reflects broad agreement, that no single spectrum band or connectivity model can support the full range of UAS operations. Commenters as diverse as CTIA, CDA, AURA, and UBBA recognize the need for a multi-band, multi-network approach to enable scalable deployment across use cases. This consensus reflects the reality that UAS operations vary significantly across geography, mission complexity, and operational risk.

AURA Network Systems emphasizes that advanced aviation systems require a "portfolio of technologies, spectrum bands, and networks" to meet aviation-grade safety and performance requirements.[3] Likewise, UBBA stresses that private broadband networks designed for utility operations offer unique advantages in terms of control, predictability, and

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GN Docket No. 26-74 et al., at 5–6 (filed May 18, 2026) (AIA Reply Comments) (emphasizing need for portfolio approach and aviation safety alignment).

[2] Comments of AURA Network Systems LLC, GN Docket No. 26-74 et al., at 4-6 (filed May 1,2026) (AURA Comments).

[3] AURA Comments at 3-5 (explaining that UAS/AAM systems require a "portfolio of technologies, spectrum bands, and networks" and integrated CNS capabilities).

interference management that are not replicable in shared commercial environments.[4] These complementary perspectives underscore that the Commission should adopt a framework that enables multiple architectures to coexist, rather than implicitly prioritizing any single model.

This conclusion is further reinforced by AUVSI, which emphasizes that no single technology, spectrum band, or network architecture can meet the full range of UAS operational requirements and that scalable deployment will depend on a portfolio of complementary communications systems supported by risk-based, technology-neutral policies.[5]

Taken together, the record supports explicit Commission adoption of a heterogeneous, multi-band architecture principle, under which different spectrum bands and network models are deployed according to mission requirements, propagation characteristics, and safety considerations. This convergence across diverse stakeholders underscores that the central question before the Commission is not whether multiple network architectures are required, but how best to enable their coordinated and complementary use in a manner that preserves safety, reliability, and scalability.

III. Commercial wireless networks are important, but must be complemented with purpose-built architectures

Licensed commercial wireless networks will play an important role in enabling UAS deployment, particularly for coverage, mobility, and scalability, as reflected across the record, including both initial and reply comments.[6] At the same time, the record reflects that reliance on any single network architecture is insufficient to meet the full range of operational, safety, and infrastructure requirements associated with scalable UAS deployment.[7]

Consistent with this record, the Associations agree that commercial wireless networks will play an important role in enabling UAS deployment.[8] However, they are only one element of a broader communications architecture and cannot independently satisfy all mission-critical operational and aviation safety requirements.

While these networks provide substantial benefits for throughput, coverage, and scalability, they are not designed to independently meet aviation-grade CNS requirements,

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[4] Comments Utility Broadband Alliance, GN Docket No. 26-74 et al., at 5-7 (filed May 1,2026) (UBBA Comments) (emphasizing that private broad band networks provide predictable performance, managed interference, and operational control not replicable in shared environments).

[5] AUVSI Comments at 4-6 (noting large-scale BVLOS operations and the need for flexible, multi−network architectures across multiple environments).

[6] See Reply Comments of CTIA-The Wireless Association, GN Docket No. 26-74 et al., at 2-4 (filed May 18, 2026) (CTIA Reply Comments); Reply Comments of AT&T Services, Inc., GN Docket No. 26-74 et al., at 3-5 (filed May 18, 2026).

[7] See AUVSI Reply Comments at 5 (filed May 18, 2026); AIA Reply Comments at 6; UBBA Comments at 5-7.

[8] See, e.g., Comments of CTIA-The Wireless Association, GN Docket No. 26-74 et al., at 6-8 (filed May 1, 2026); Comments of Qualcomm Inc., WT Docket No. 22-323 et al., at 12-14 (filed May 1, 2026) (Qualcomm Comments) (describing the role of commercial wireless networks in enabling scalable UAS communications).

including safety-certified command-and-control, navigation integration, and real-time airspace coordination. The Commission should therefore ensure that policies enable these networks to operate in coordination with, rather than as a substitute for, complementary systems.

A. Shared network architectures do not guarantee reliable and predictable performance

Commercial networks are multi-tenant environments, subject to congestion, prioritization constraints, and rely on provider-controlled quality-of-service mechanisms. Airborne UAS operations further introduce distinct technical considerations: elevated platforms may establish line-of-sight connections with multiple base stations simultaneously, altering propagation patterns and creating system-wide interference effects that do not arise in purely terrestrial deployments.[9]

By contrast, critical infrastructure operations require reliable, predictable performance that is not subject to congestion or third-party prioritization decisions. These requirements are achieved through enterprise-controlled networks operating with known devices, managed access, and engineered interference environments.[10] As a result, utilities and other infrastructure operators deploy private broadband networks designed specifically to support safety-critical applications.

These distinctions are not theoretical. LCRA demonstrates that private broadband networks operating in bands such as 900 MHz are already being deployed and evaluated to support BVLOS operations across large service territories, while enabling utilities to maintain control over interference and network performance characteristics critical to safety-of-life operations.[11]

B. Infrastructure and emergency use cases require network control and resilience

Utilities must maintain communications reliability during storms, wildfires, and grid emergencies. These requirements necessitate private network deployments, redundant communications pathways, and dedicated spectrum resources. During such events, commercial networks may degrade, prioritize public traffic, or operate outside normal conditions.

These operational realities necessitate private network deployments, redundant communications pathways, and access to dedicated spectrum resources. Utilities therefore cannot rely solely on commercial networks to support missions that directly affect public safety, system restoration, and grid resilience.

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[9] Comments of the American Fuel & Petrochemical Manufacturers, GN Docket No. 26-74 et al., at 6–9 (filed May 1, 2026) (AFPM Comments) (explaining that airborne UAS operations introduce line-of-sight propagation effects and can increase noise floor and degrade network performance).

[10] UBBA Comments at 6-8 (explaining that enterprise−controlled private networks provide managed interference environments, known device populations, and predictable performance characteristics distinct from public commercial mobile networks).

[11] Reply Comments of Lower Colorado River Authority, GN Docket No. 26-74 et al., at 4–6 (filed May 18, 2026).

C. Aviation safety requirements cannot be satisfied by connectivity alone

The record demonstrates that safe UAS integration depends on certified detect-and-avoid (“DAA”) systems, reliable and redundant command-and-control (“C2”) links, and integration with air traffic management systems.[12] Connectivity, whether commercial or otherwise, is only one component of a broader aviation safety architecture.

This conclusion is reinforced by CDA, which explains that UAS operators already rely on redundant and hybrid communications strategies, combining licensed, unlicensed, and private network resources to meet mission requirements and manage risk.[13] The Commission should build on this operational reality by adopting policies that facilitate these hybrid architectures.

Similarly, ENTELEC highlights that UAS platforms increasingly function as components of broader communications infrastructure, further reinforcing the need to integrate multiple network layers, including commercial, private, and aerial systems, to support diverse operational requirements.[14]

IV. Flexible-use spectrum should be expanded with targeted safeguards

The record reflects that expansion of flexible-use spectrum for UAS should proceed through targeted, band-specific actions where technical, operational, and safety frameworks are sufficiently mature, rather than through broad, simultaneous expansion across multiple bands.[15]

More broadly, the record supports modernization of spectrum rules through a flexible, risk-based framework that preserves operator choice across multiple bands while protecting safety-critical and infrastructure-sensitive operations.[16] Those positions are not in tension. They point to a single policy principle: the Commission should expand flexible use where the operational context supports it but should impose targeted safeguards where airborne operations increase interference exposure, affect shared-band performance, or implicate protected aviation and critical infrastructure systems.

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[12] Air Line Pilots Association, International, GN Docket No. 26-74 at 2-3 (filed May 1,2026) (ALPA Comments) (requiring certified detect–and–avoid systems and reliable C2 links); see also Qualcomm Comments at 12-14 (discussing safety–critical communications requirements for UAS operations).

[13] Comments of Commercial Drone Alliance, GN Docket No. 26-74 et al., at 6–8 (filed May 1,2026) (CDA Comments) (describing use of hybrid communications architectures across licensed, unlicensed, and private networks).

[14] Comments of ENTELEC, GN Docket No. 26-74 et al., at 4–6 (filed May 1,2026)

[15] See AUVSI Reply Comments at 5-6; AIA Reply Comments at 6.

[16] CDA Comments at 3-5. (explaining that UAS platforms are increasingly integrated into enterprise communications systems and function as extensions of broader infrastructure networks supporting industrial and operational use cases).

A. Airborne operations introduce unique interference dynamics

Airborne UAS operations present propagation and interference characteristics that differ materially from terrestrial deployments. Unlike ground-based devices, airborne systems may maintain line-of-sight to multiple base stations, interact with large geographic areas, and can raise the noise floor across entire networks.[17] These effects are particularly relevant in CBRS and other shared bands, and industrial environments with dense RF deployments. These concerns are particularly significant for critical infrastructure operations, where interference can affect safety, operational control, and emergency response systems.[18]

Importantly, these concerns are mitigated in certain contexts, particularly where UAS operations occur within private, vertically integrated network environments. UBBA explains that private broadband networks controlled by utilities can manage both terrestrial and aerial spectrum usage more effectively, reducing interference risk and enabling safe integration of UAS operations.[19] This distinction between open, shared network environments and controlled private networks is critical and should be reflected explicitly in Commission policy.

B. A risk-based, tiered framework is required

The Commission should adopt a tiered, risk-based framework that permits expanded use of flexible-use spectrum for low-altitude operations while requiring safeguards calibrated to the risk presented.[20] Such safeguards may include altitude-aware power limits, coordination mechanisms, real-world testing validation, and protections for critical bands and sensitive operating environments. This approach aligns innovation with operational realities and avoids both overbroad restrictions and underinclusive protections.

This framework also aligns with the broader record evidence that spectrum policy should differentiate among use cases, environments, and network architectures, rather than applying uniform rules across all UAS operations.

In practice, this approach supports a tiered spectrum framework, in which aviation spectrum provides safety-critical command-and-control, private and enterprise networks support infrastructure operations under controlled conditions, commercial networks provide scalable connectivity, and unlicensed spectrum supports low-risk and redundant use cases.

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[17] AFPM Comments at 6-8 (describing how airborne operations alter propagation conditions and increase interference exposure).

[18] Id. at 7-9 (describing how interference from airborne UAS operations can degrade private LTE/5G systems supporting industrial safety and control functions); see also API Reply Comments at 1-2.

[19] UBBA Comments at 6-8 (explaining how private, enterprise–controlled networks can mitigate interference risks through managed access and engineered environments).

[20] CDA Comments at 3-5 (advocating a flexible, risk-based approach to spectrum use across multiple bands); AURA Comments at 3-5 (emphasizing that no single spectrum band or network can support all UAS operations); UBBA Comments at 5-7 (supporting differentiated use of spectrum based on network architecture and operational requirements).

V. Aviation bands must remain protected

The Commission must continue to protect safety-critical aviation bands and coordinate closely with the FAA and aviation stakeholders to ensure that UAS expansion does not compromise the integrity of the NAS.[21]

These protections are foundational to safe integration and should not be relaxed to accommodate expanded UAS operations in other bands. Rather, policies enabling UAS deployment should be developed in parallel with, and not at the expense of, existing aviation safety systems.

VI. BVLOS scaling must be conditioned on validated safety systems

The Commission's goals for expanding UAS operations depend heavily on scaled BVLOS deployment. However, the record demonstrates that spectrum availability alone cannot enable safe BVLOS operations. Before expanding spectrum access, the Commission should require certification of DAA systems, demonstrated reliability of C2 links, and validation of system performance in complex environments.[22] Accelerating spectrum access without these conditions risks undermining the safety of the NAS.

More broadly, the record reflects that scaling UAS operations must proceed in parallel with the validation and certification of the systems on which safety depends and should not be based on spectrum availability alone.[23]

VII. Emerging safety technologies should be encouraged, but not prematurely relied upon

Technologies such as aircraft-to-everything (A2X) communications represent promising developments in airspace safety and situational awareness. However, these technologies are still evolving, have not yet been fully validated or certified, and their operational performance in dense environments remains under development.[24]

Accordingly, the Commission should support the development and testing of such technologies and facilitate appropriate spectrum access. However, it should avoid predicating regulatory decisions or spectrum policy on unproven capabilities. This approach ensures that innovation continues while maintaining alignment with established safety frameworks.

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[21] ALPA Comments at 2 (emphasizing protection of safety–critical aviation spectrum and coordination with the FAA).

[22] ALPA Comments at 2-3 (requiring certified detect–and–avoid systems and validated safety performance before scaling BVLOS operations).

[23] Cite ALPA Comments at 3 (emphasizing safety validation before expansion); AURA Comments at 6-7 (describing aviation–grade reliability and CNS requirements).

[24] Qualcomm Comments at 13-16 (discussing A2X and emerging technologies; ALPA Comments at 3 (noting need for operational deployment).

VIII. C-UAS policy must be narrowly tailored and non-interfering

The record highlights the importance of counter-UAS ("C-UAS") capabilities, particularly for critical infrastructure protection and public safety operations. At the same time, the record demonstrates that RF-based mitigation (e.g., jamming or spoofing) can create unintended interference with systems such as GNSS signals, radio altimeters, and other aviation communications.[25]

The Commission should adopt a narrowly tailored approach that permits C-UAS capabilities only where clearly authorized, controlled, and certified. The Commission should prohibit operations that could cause interference to aviation or other safety-critical systems. Additionally, the Commission should require coordination in sensitive environments (e.g., near airports).

This balanced approach ensures that C-UAS capabilities can be developed and deployed to address legitimate security threats without introducing new risks to aviation safety or critical communications systems.

IX. The Commission should prioritize immediate, actionable steps

The record reflects a clear consensus that UAS deployment should proceed along multiple parallel and complementary spectrum pathways, rather than waiting for any single band or system to reach full maturity. Where the record is complete and technical frameworks are sufficiently developed, the Commission should act expeditiously, while maintaining safety constraints

A. Advancing rules for aviation spectrum (e.g., 5030–5091 MHz)

The record demonstrates strong alignment on the importance of the 5030–5091 MHz band for aviation-grade command-and-control communications. CDA, AURA, and other stakeholders emphasized that this band represents a critical foundation for safe UAS integration into the NAS and should be prioritized for rapid deployment.[26] At the same time, the record also makes clear that reliance on this band alone will not enable near-term scaling, reinforcing the need to advance complementary spectrum solutions in parallel.

The record also highlights the importance of scalable coordination mechanisms, such as Dynamic Frequency Management Systems (DFMS), to enable efficient use of the band while maintaining interference protection and operational reliability.[27] DFMS is not simply a

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[25] Comments of Alarm Industry Communications Committee, GN Docket No. 26-74 et al., at 2-3 (discussing C–UAS deployment considerations) (AICC Comments) (filed May 1,2026); ALPA Comments at 4–5(warning of interference risks to GNSS and aviation systems).

[26] See, e.g., CDA Comments at 7; AURA Comments at 8-9; AFPM Comments at 5-6 (all supporting use of 5030-5091 MHz band for aviation-grade command-and-control).

[27] See, e.g., Comments of Wireless Innovation Forum, GN Docket No. 26-74 et al., at 4–7 (filed May 1, 2026) (WInnForum Comments) (describing the need for dynamic spectrum coordination systems to enable

coordination tool, but a core implementation mechanism for enabling scalable use of the band.[28]

Utilities further emphasize that coordination mechanisms such as DFMS must support stable, continuous spectrum access across large geographic areas and during emergency operations, where loss of communication could create safety risks to infrastructure and personnel.[29]

B. Adopting rules to enable 450 MHz deployment

The record reflects strong and consistent support for Commission action on the 450 MHz band. AURA has demonstrated both technical feasibility and substantial private investment in this band, while CDA and other stakeholders explicitly support advancing this proceeding to enable near-term deployment.[30] The Commission should therefore move expeditiously to adopt final rules, recognizing the 450 MHz band as a deployment-ready, complementary solution for wide-area and infrastructure-scale UAS.

In particular, the record demonstrates that the 450 MHz band is uniquely capable of supporting long-range, low-altitude BVLOS communications, especially for rural and infrastructure-environments where higher frequency spectrum cannot provide comparable coverage.[31]

Finalizing rules in this band represents one of the most immediate opportunities for the Commission to translate record consensus into real-world deployment.

C. Modernizing experimental licensing

The record reflects broad agreement that the Commission's experimental licensing framework must be modernized to support the scale, speed, and diversity of UAS development. Commenters including CDA, AUVSI, and UBBA all emphasize that current processes, originally designed for traditional communications testing, are not well-suited to iterative, operationally driven UAS development.[32]

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scalable, interference-protected UAS operations); AURA Comments at 8-9) (emphasizing the importance of structured coordination mechanisms to support aviation-grade communications).

[28] See, e.g., WInnForum Comments, at 4-7 (explaining that dynamic spectrum coordination systems are necessary to enable scalable and interference–protected UAS operations); AURA Comments, at 8-9 (discussing the need for structured coordination mechanisms to support aviation–grade communications).

[29] See Reply Comments of Utilities Technology Council, GN Docket No. 26-74 et al., at 5 (filed May 18, 2026) (UTC Reply Comments).

[30] AURA Comments at 10-12 (describing readiness for deployment in the 450 MHz band and existing network investment); CDA Comments at 9-10 (supporting use of 450 MHz band to enable near–term UAS deployment and expand operational capabilities).

[31] See AIA Reply Comments at 8-10; AUVSI Reply Comments at 6; UTC Reply Comments at 2.

[32] See, e.g., AUVSI Comments at 8-10 (calling for streamlined and scalable experimental licensing frameworks); CDA Comments at10-11 (recommending multi–site and modular licensing approaches for UAS

To address these limitations, the Commission should adopt a streamlined experimental licensing framework that:

- Provides expanded geographic scope and duration, recognizing that infrastructure-scale UAS deployments span large service territories.
- Enables multi-band, multi-use authorizations to support integrated communications architectures.
- Supports repeatable and modular authorizations, reducing administrative burden, such as when applicants seek to extend or adapt previously approved testing parameters without introducing new interference risks.
- Facilitates participation by infrastructure operators, including utilities, in real-world environments.

Importantly, experimental licensing reform should recognize that utilities and other infrastructure operators function not merely as developers, but as deployment platforms, requiring testing under actual operating conditions at scale.

At the same time, streamlined processes must retain appropriate safeguards, including coordination requirements and interference protections, particularly where testing occurs in shared bands and near safety-critical systems.

By modernizing Part 5, the Commission can reduce unnecessary delay while enabling the operational validation necessary to support safe, scalable deployment.

D. Supporting real-world testing in operational environments

The record demonstrates that the next phase of UAS deployment depends on real-world operational testing, not laboratory validation alone. Commenters including CDA, AUVSI, and WInnForum emphasize that UAS technologies, particularly those supporting BVLOS operations, detect-and-avoid systems, and dynamic spectrum access, must be validated under realistic conditions to ensure safety and reliability at scale.[33]

For electric utilities this requires testing that reflects actual deployment conditions including:

- Long-distance linear infrastructure such as transmission and distribution corridors.
- Remote and rural areas with distinct propagation and coverage characteristics.

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deployments); UBAA Comments at 9-10 (emphasizing need for licensing frameworks that support infrastructure–scale testing and deployment).

[33] See e.g., WInnForum Comments at 7-9 (emphasizing need for testing dynamic spectrum sharing and UAS communications systems in real–world environments); UASVI Comments at 9 (noting that UAS technologies must be validated under operational conditions to ensure safety and scalability); ALPA at 3 (emphasizing need for validated performance before full integration into the NAS).

- Emergency and contingency scenarios, including storm response and wildfire mitigation.

These operational contexts cannot be replicated in limited testbeds or static environments.

Accordingly, the Commission should:

- Expand access to geographically diverse test environments, including rural, industrial, maritime, and infrastructure-focused areas.
- Enable participation by infrastructure operators as test hosts, recognizing their role in providing realistic operational settings.
- Support multi-network testing, including combination of commercial wireless, private network, and aviation spectrum resources.

The Commission should also coordinate with federal partners, including the FAA, to ensure that testing reflects real-world operational conditions while preserving safety-of-life protections.

Finally, real-world testing should be understood as complementary to, not a substitute for formal certification processes. It provides a critical bridge between research and certification by enabling controlled, data-driven validation of systems under operational conditions.

Together, modernized experimental licensing and expanded real-world testing will enable the United States to move beyond pilot programs and toward sustained, infrastructure-scale deployment, while preserving safety and interference protections.

X. Conclusion

The Commission has a timely opportunity to act on areas of broad consensus in the record and establish a durable framework for scalable UAS deployment.

The record does not present a conflict among competing approaches. Rather, it reflects a convergence around a layered, multi-network architecture in which commercial networks, private systems, aviation spectrum, and emerging technologies each play complementary roles. Consistent with this consensus, the Commission should adopt a multi-band, multi-network framework that recognizes licensed commercial and private networks as complementary systems, expands spectrum access through targeted, risk-based safeguards, and advances near-term spectrum and licensing actions where the record is complete.

This approach reflects the clear conclusion that no single network, spectrum band, or technology will deliver drone dominance. Instead, success depends on enabling a resilient, interoperable, and risk-calibrated communications ecosystem that supports diverse operational requirements while preserving the safety and reliability of the NAS and critical infrastructure systems.

By taking these steps, the Commission can accelerate UAS deployment at scale while maintaining the safety, reliability, and operational integrity foundational to both the NAS and the Nation's critical infrastructure.

Respectfully submitted,

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