



October 6, 2026

The Honorable Chris Wright
Secretary
U.S. Department of Energy
1000 Independence Avenue, SW
Washington, DC 20585

Dear Secretary Wright:

We are writing to express concern that NextNav's proposal, currently pending before the Federal Communications Commission (FCC), would fundamentally change how the 902-928 MHz band is used and could create harmful interference with communications systems that are deeply embedded in energy infrastructure operations. Electric, oil, and natural gas operators rely on these systems to monitor, operate, and maintain critical infrastructure safely and reliably. While we support efforts to strengthen the nation's positioning, navigation, and timing (PNT) capabilities, we should not create new risks to energy infrastructure in the process.

The 902-928 MHz band supports a broad range of mission-critical communications systems used by electric, oil, and natural gas operators, including systems supporting operational monitoring and control, outage and incident response, infrastructure management, and emergency operations. These systems are particularly important in rural and geographically challenging environments where reliable communications are essential to maintaining safe and reliable energy service.

The scale of potential impact is significant. Electric utilities have identified more than 160 million devices that could be affected by the proposal and estimate that replacing or modifying affected systems could take years and impose costs measured in the tens of billions of dollars. Similar disruption across the broader energy sector could divert resources from infrastructure modernization, resilience, and other investments necessary to support growing energy demand. Many of these systems remain productive assets with years of useful life remaining. Requiring their premature replacement would impose substantial costs on consumers while diverting capital from investments that directly enhance reliability, resilience, and energy affordability.

Accordingly, given DOE's responsibility for energy security and critical infrastructure reliability, we respectfully urge DOE to engage directly with the FCC, the National Telecommunications and Information Administration, and other relevant federal agencies. As the FCC's draft notice of proposed rulemaking undergoes interagency review, DOE should help ensure that the potential impacts of this proposal on energy infrastructure are fully understood and that any spectrum reconfiguration fully protects communications systems essential to the safe and reliable operation of the nation's energy infrastructure.

Energy security, reliability, resilience, and consumer cost implications should be fully considered before the FCC determines whether to move forward with a rulemaking. While some may view a notice of proposed rulemaking as merely the beginning of a process, the initiation of a proceeding alone could delay or alter long-term investments in communications infrastructure that is expected to remain in service for decades. Given DOE's expertise and responsibilities in these areas, its perspective will be critical to ensuring informed decision-making. At a minimum, the FCC should develop a comprehensive evidentiary record regarding interference risks, operational impacts, reliability implications, and consumer costs, supported by energy sector-validated technical analyses demonstrating compatibility with incumbent systems.

Our organizations stand ready to work with DOE, the FCC, and other stakeholders to support resilient PNT solutions that strengthen national security while preserving the reliability, affordability, and resilience of the nation's energy infrastructure.

Sincerely,

Edison Electric Institute
American Gas Association
American Petroleum Institute
American Public Power Association
Interstate Natural Gas Association of America
Large Public Power Council
National Rural Electric Cooperative Association