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July 8, 2026

Mr. Noah Jackson
Legislative Clerk
Committee on Energy and Commerce
U.S. House of Representatives
2125 Rayburn House Office Building
Washington, DC 20515

Dear Chairman Hudson,

Thank you for the opportunity to testify before the Subcommittee on Communications and Technology on June 4, 2026, and for the follow-up letter requesting additional information for the record. CTA appreciates the Subcommittee's examination of Positioning, Navigation, and Timing (PNT) capabilities in the U.S., and we look forward to continuing to work with the Committee to support technologies complementary to GPS.

The Honorable Troy Carter

To your knowledge, what work has the FCC done to complete transparent, independently validated interference testing with utilities operating real-world systems?

To our knowledge, the FCC has not conducted any transparent, independently validated interference testing involving utilities operating real-world systems in the Lower 900 MHz band (nor has any other federal agency with equities in this spectrum band). While the FCC has historically relied on testing and analyses conducted by interested parties, the deficiencies of NextNav's recent co-existence "testing" illustrate why this approach is insufficient to address the multitude of concerns raised against NextNav's proposal.

More specifically, the two coexistence demonstrations that NextNav repeatedly referenced during the hearing evaluated only a single device representing three (out of hundreds, if not thousands) of the use cases deployed in the Lower 900 MHz band, observed under narrowly defined conditions. NextNav has also withheld critical technical parameters needed to independently verify even these limited results.

NextNav's demonstrations lack the scientific rigor and transparency necessary to draw any reliable conclusions and fail to show that its high-power 5G transmissions can coexist with the hundreds of millions of incumbent low-power devices in the band, including unlicensed IoT

devices, RFID, security and life-safety devices. NextNav's technical submissions filed with the FCC suffer from similar shortcomings, as these filings rely upon several faulty assumptions and, more fundamentally, do not attempt to assess the potential interference from the hundreds of millions of unlicensed devices to 5G operations in the band.

An independent study by Pericle Communications Company concluded that unlicensed Part 15 devices and NextNav's proposed network "cannot coexist in any practical way" finding that some categories of affected devices would need a signal 538 times greater to overcome interference, and that wireless cameras and similar unlicensed devices would experience interference and blocking more than 60% of the time. The same interference dynamics extend to RFID systems as well. According to independent analysis by engineering firm LS telcom, NextNav's 5G signals would cause significant levels of harmful interference to RFID systems and that, without RFID, inventory management accuracy would plummet from 95% to 65%.

CTA would welcome independent testing by a federal government agency to verify NextNav's claims of co-existence. Any such testing should evaluate a representative sampling of devices reflective of the many transmission standards, use cases, geographies, and topographies in which these devices operate in the real-world today, including nationwide utility deployments. The agency should also disclose relevant technical parameters (such as reference bandwidth and power density) so that results can be independently verified and replicated.

In the absence of independent government testing verifying NextNav's claims of co-existence, the weight of the evidence in the FCC record proves that incumbent unlicensed devices and high-power operations cannot coexist in the band and that incumbent utility networks are likely to suffer harmful interference if NextNav's proposal were granted.

Sincerely,

A handwritten signature in black ink that reads "David Grossman". The script is cursive and fluid, with the first letters of each word being capitalized and prominent.

J. David Grossman
Vice President, Policy & Regulatory Affairs
Consumer Technology Association

CC: The Honorable Doris Matsui, Ranking Member, Subcommittee on Communications and Technology
The Honorable Troy Carter, Member, Subcommittee on Communications and Technology