November 13, 2025

VIA ELECTRONIC FILING

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

RE: *Wireless Telecommunications Bureau and Office of Engineering and Technology Seek Comment on NextNav Petition for Rulemaking* (WT Docket No. 24-240); *Promoting the Development of Positioning, Navigation, and Timing Technologies and Solutions* (WT Docket No. 25-110)

Dear Ms. Dortch:

On behalf of the membership of the International Association of Fire Chiefs (IAFC), the International Association of Chiefs of Police (IACP), the Association of Public-Safety Communications Officials-International (APCO), and the National Sheriffs' Association (NSA), we thank the Federal Communications Commission (FCC) for the opportunity to provide a public safety perspective on NextNav's Petition for Rulemaking ("*NextNav Petition*") seeking to alter the rules on the 902-928 MHz band (Lower 900 MHz Band) and the related Notice of Inquiry on Promoting the Development of Positioning, Navigation, and Timing Technologies and Solutions.[1]

We recognize NextNav as a leader in determining the accurate location of a caller in a building and acknowledge their work in developing technology to ascertain the location of public safety responders in buildings.

However, as the leadership of America's public safety services, we believe NextNav's proposed PNT solutions could negatively affect existing incumbent operations essential to the preservation of life and safety. Thus, as explained below, we respectfully urge the FCC to deny the *NextNav Petition* and refrain from further action on proposals outlined in the *PNT NOI* to the extent they would require changes to the Lower 900 MHz band.[2]

Evidence from recent reports and studies, such as the engineering review submitted into the record by Pericle,[3] highlight potential risks of NextNav's proposal to critical life safety systems. These systems are prevalent throughout our country, especially in Americans' homes and businesses. The rule changes requested in the *NextNav Petition* could have significant negative consequences for public safety.

Currently, unlicensed devices operate in the Lower 900 MHz Band, including many types of life safety technology that are used by public safety agencies and homeowners on a daily basis. Altering the rules for this band, as NextNav proposes, risks creating interference with these devices, which could compromise the reliable

[1] NextNav Petition for Rulemaking, Enabling Next-Generation Terrestrial Positioning, Navigation, and Timing and 5G: A Plan for the Lower 900 MHz Band (902-928 MHz) (filed Apr. 16, 2024) ("*NextNav Petition*"); *Promoting the Development of Positioning, Navigation, and Timing Technologies and Solutions*, WT Docket No. 25-110, Notice of Inquiry, FCC 25-20 (Mar. 28, 2025) ("*PNT NOI*").

[2] *PNT NOI* at para. 29 (seeking comment on PNT technologies that rely on or incorporate solutions provided by NextNav).

[3] *See* Radio Coexistence Study Between Lower 900 MHz Incumbents and Potential 5G Network, Pericle Communications Company (September 9, 2025).

operation of technologies relied upon for public safety and emergency response. The following are examples of devices that could be affected if NextNav's proposals were allowed to proceed:

- **Man down systems/solutions**. These devices and solutions help provide public safety agencies with the location of first responders and other pertinent life-safety data while on the scene of an incident. They are especially critical for public safety personnel, because they provide critical tracking data for first responders in unfamiliar settings.

- **Self-Contained Breathing Apparatus (SCBA) systems.** SCBA systems provide respiratory protection for first responders in hazardous environments, including fire and areas with toxic gas. These devices may incorporate connectivity features over the Lower 900 MHz band to monitor firefighter status, air supply levels, and environmental conditions. This enables remote monitoring of air cylinder pressures, automatic alerts if a wearer is in distress or immobile, and integration with incident management software for real-time safety oversight.

- **IoT wildfire sensing and wind profile radars.** Connected cameras and sensors equipped with AI use the Lower 900 MHz band to detect environmental conditions conducive to wildfires and create wind predictions for wildfire mitigation. These systems provide early warning and situational awareness to inform public safety decision-making and resource deployment.

- **Preemption of traffic signals**. These devices help emergency vehicles override typical traffic signal operations. They ensure that emergency vehicles have the right-of-way and can reach the incident scene in a quick and timely manner.

- **Automatic utility gas/electric shut off capabilities.** When first responders encounter a scene where live electricity or a gas leak is present, often their first call is to utility companies. Remote shut-off systems operate on the Lower 900 MHz Band. If gas and electric companies cannot operate their remote shut off systems, first responders' lives and safety could be at risk.

- **Smoke and carbon monoxide detectors**: These detectors can be found in the homes of most American citizens. These devices alert people to unsafe levels of smoke or carbon monoxide present in residences or businesses, so that people can evacuate safely. These detectors are often connected directly to alarm companies to allow first responders to arrive on the scene more quickly.

The IAFC, IACP, APCO, and NSA appreciate the opportunity to comment on NextNav's proposal for the Lower 900 MHz band. If the rules governing the use of devices in the Lower 900 MHz band are changed in accordance with NextNav's proposal, many unlicensed life-safety devices may experience reduced functionality or operational limitations that place first responders and the public at risk. Furthermore, NextNav has not presented any proposals that we believe will prevent these potential impacts to critical life-safety systems or measures to mitigate these disruptions should they occur.

In summary, while we appreciate the Commission's ongoing exploration of PNT technologies and acknowledge the potential of the various approaches outlined in the *PNT NOI*, we urge the FCC to consider the critical implications of NextNav's proposal and deny their petition for rulemaking, as well as any proposals in the *PNT NOI* that would require changes to the Lower 900 MHz band. Instead, we encourage the FCC to continue pursuing alternative PNT solutions to support public safety while ensuring that incumbent life-safety systems remain fully protected.

Respectfully,

International Association of Fire Chiefs (IAFC)
International Association of Chiefs of Police (IACP)
Association of Public-Safety Communications Officials-International (APCO)
National Sherrifs' Association (NSA)