

*Before the*  
**Federal Aviation Administration**  
Washington, D.C.

*In re* Remote Identification of  
Unmanned Aircraft Systems

Docket No. FAA-2019-1100

**COMMENTS OF THE  
ALLIANCE FOR TELECOMMUNICATIONS INDUSTRY SOLUTIONS**

The Alliance for Telecommunications Industry Solutions (ATIS) submits these comments in response to the Federal Aviation Administration’s (FAA) *Notice of Proposed Rulemaking (NPRM)*, released November 27, 2019, regarding the remote identification of unmanned aircraft systems.<sup>1</sup> In these brief comments, ATIS provides input regarding the broadcasting of unmanned aerial vehicles (UAV) identification information and supports the proposed requirement regarding the use of non-proprietary broadcast specifications.

**I. BACKGROUND**

ATIS is a global standards development and technical planning organization that develops and promotes worldwide technical and operations standards for information, entertainment, and communications technologies. ATIS’ diverse membership includes key stakeholders from the Information and Communications Technologies (ICT) industry –wireless, wireline, and VoIP service providers, equipment manufacturers, broadband providers, software developers, consumer electronics companies, public safety agencies, and internet service providers. ATIS is also a founding partner and the North American Organizational Partner of the Third Generation Partnership Project (3GPP), the global collaborative effort that has developed

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<sup>1</sup> 84 Fed. Reg. 65316 (published Dec 31, 2019).

the Long-Term Evolution (LTE), LTE-Advanced and 5G wireless specifications. Nearly 600 industry subject matter experts work collaboratively in ATIS' open industry committees and incubator solutions programs.

In 2017, ATIS launched its UAV initiative to focus on the use and operation of low-altitude, light-weight UAVs to support the internal and external business of needs of ICT companies.<sup>2</sup> The goal of this initiative to help identify the enablers and solutions for cellular-as-a-drone communications technology. The initiative has compiled field-testing summaries characterizing the ability of existing cellular networks to offer communications services to UAVs and has developed white papers identifying areas where cellular services can provide important functionality to support UAV command and control. The white papers and reports<sup>3</sup> developed by this initiative include:

- *Use of Cellular Communications to Support Unmanned Aerial Vehicle (UAV) Flight Operations* (ATIS-I-0000074) (August 2019)
- *Use of UAVs for Restoring Communications in Emergency Situations* (ATIS-I-0000071) (December 2018)
- *Support for UAV Communications in 3GPP Cellular Standards* (ATIS-I-0000069) (October 2018)
- *Unmanned Aerial Vehicle (UAV) Utilization of Cellular Services Enabling Scalable and Safe Operation* (ATIS-I-0000060) (September 2017)

This initiative is currently working with the 3GPP to ensure that global mobile cellular standards can meet U.S. requirements for UAV remote identification.

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<sup>2</sup> These comments reflect input from the participants in the ATIS UAV initiative: AT&T, Bell Canada, Ericsson, Facebook, FirstNet, Futurewei, Intel, Intelsat, Interdigital, JMA Wireless, L3Harris Technologies, NextNav, Ollin Aviation, Pivotal Commware, Qualcomm, Sprint, TELUS, and Verizon.

<sup>3</sup> These reports and white papers are available at no charge from the ATIS white paper repository at [https://www.atis.org/01\\_resources/whitepapers/](https://www.atis.org/01_resources/whitepapers/).

## II. COMMENTS

In the *NPRM*, the FAA proposes to establish design and production requirements for two categories of remote identification:

- (1) The transmission of identity information to a remote ID UAV Service Supplier (USS) via the Internet; and
- (2) Local broadcast of identity information from the unmanned aircraft systems (UAS).<sup>4</sup> (i.e., Broadcast ID)

ATIS recommends the FAA confirm that the second category of identification (the Broadcast ID category) does not have a network broadcast component but instead is a local broadcast directly from the UAS to receivers in physical proximity. ATIS believes that this interpretation is intended meaning of the description of the broadcast operation in Section XII.D.9. of the *NPRM*, entitled “Message Transmission”.

ATIS also recommends that the FAA reconsider the requirement proposed in the *NPRM* that the spectrum for Broadcast ID be “radio frequency spectrum in accordance with Part 15 of title 47, Code of Federal Regulations...”<sup>5</sup> ATIS understands that the FAA is not proposing a specific frequency band but envisions that industry stakeholders would identify the appropriate spectrum to use for this capability and would propose solutions through the means of compliance acceptance process.<sup>6</sup> ATIS believes that requiring the use of Part 15 spectrum could unnecessarily restrict the development and deployment of UAV technology. ATIS recommends that the FAA permit UAVs to broadcast identification using any suitable spectrum, including licensed cellular spectrum, that the operator is authorized to use.

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<sup>4</sup> 84 Federal Register 72439.

<sup>5</sup> 84 Federal Register 72520.

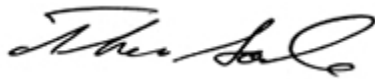
<sup>6</sup> 84 Federal Register 72476.

For both the Networked ID and Broadcast ID categories of UAV identification, ATIS supports the requirement that non-proprietary (i.e., standardized) solutions be used.<sup>7</sup> Because the use of proprietary solutions could create interoperability challenges, ATIS recommends that the FAA encourage the industry to further develop suitable interoperable standards over appropriate technologies, including mobile cellular technology.

## **II. CONCLUSION**

ATIS appreciates the opportunity to provide its input to the *NPRM* and welcomes the opportunity to provide additional information about the industry work described in these comments.

Respectfully submitted,



Thomas Goode  
General Counsel  
Alliance for Telecommunications Industry Solutions  
1200 G Street, NW  
Suite 500  
Washington, DC 20005  
(202) 628-6380

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<sup>7</sup> 84 Federal Register 72476.