



May 10, 2025

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
45 L Street, NE
Washington, D.C. 20054

In the Matter of Review of Promoting the Development of Positioning, Navigation, and Timing Technologies and Solutions (WT Docket No. 25-110).

Dear Ms. Dortch:

The U.S. Chamber of Commerce (“Chamber”) appreciates the opportunity to comment on the Federal Communications Commission’s (“FCC” or “Commission”) Notice of Inquiry on the above referenced proceeding (“NOI”).¹ The NOI seeks comment on types of positioning, navigation, and timing (“PNT”) technologies and solutions, considerations on each technology and solution, and potential Commission actions to support PNT resiliency.² The Chamber commends the Commission for issuing an NOI on this topic given the importance of PNT solutions to the business community.

I. PNT Resiliency Is of Critical importance to the Business Community

PNT solutions are core to numerous private sector industries, processes, and products include transportation (e.g. rideshare, trucking, commercial aviation, unmanned aircraft), financial services (e.g. stock markets), supply chain, national defense, emergency services, broadband telecommunications, water and wastewater treatment, agriculture, and many other types of important services and infrastructure.³ Today, PNT is primarily provided through the Global Positioning System (“GPS”), which is critical to our national security and economy.⁴ However, given the potential risks,

¹ *In the Matter of Promoting the Development of Positioning, Navigation, and Timing Technologies and Solutions*, Notice of Inquiry, WT Docket No. 25-110 (rel. Mar. 28, 2025) (“NOI”).

² *Id.*

³ *Id.* at 1; Comments of the Alliance for Automotive Innovation, WT Docket No. 25-110, at 3-4 (filed April 28, 2025); Comments of NextNav Inc., WT Docket No. 25-110, at 3 (filed April 28, 2025) (“Alliance for Automotive Innovation Comments”); Comments of the Edison Electric Institute, WT Docket No. 25-110, at 2 (filed April 28, 2025) (“EEI Comments”); CTIA – The Wireless Association Comments, WT Docket No. 25-110, at 3-5 (filed April 28, 2025) (“CTIA Comments”); Comments of USTelecom, WT Docket No. 25-110, at 2-3 (filed April 28, 2025).

⁴ NOI at 1.

including jamming, military action by foreign adversaries, and accidental disruption, government must work to develop resilient PNT solutions. The Chamber supports the Commission's decision to consider actions that would form a resilient and secure PNT system using complementary technologies that may be used in conjunction with GPS or alternative PNT technologies when necessary to address vulnerabilities of the business community.⁵

II. The Commission Should Facilitate the Responsible Deployment of Achievable PNT Solutions

The PNT marketplace is robust, competitive, and offers a wide range of different technological solutions.⁶ The Chamber believes that the Commission, and policymakers broadly, should ensure a technological-neutral approach to PNT resiliency and pursue a constellation of PNT solutions, which should include both space-based and terrestrial PNT.⁷ This will ensure that there are multiple backup solutions and avoid a single PNT provider.⁸

The Commission's approach should also be cabined by a few considerations. First, the Commission should prioritize solutions that are tested for reliability or are in the process of being tested. PNT resiliency is an immediate necessity, and proven solutions are most likely to meet the business community's and the Commission's objectives of a timely PNT alternative.

Second, the Commission should focus on solutions that have been established do not adversely impact existing spectrum users.⁹

Third, the Chamber recommends that the Commission, in partnership with other relevant federal agencies, create a "whitelist" of PNT technologies that meet these criteria to provide a marketplace signal that the federal government is serious

⁵ *Id.* at 4-6.

⁶ *See Id.* at 10-14.

⁷ CTIA Comments at 16; Comments of Iridium Communications Inc., WT Docket No. 25-110, at 8 (filed April 28, 2025).

⁸ Comments of the Information Technology Industry Council, WT Docket No. 25-110, at 4-5 (filed April 28, 2025) ("ITI Comments"); Comments of WISPA – the Association for Broadband Without Boundaries, WT Docket No. 25-110, at 2 (filed April 28, 2025) ("WISPA Comments"); Comments of the GPS Innovation Alliance, WT Docket No. 25-110, at 21 (filed April 28, 2025).

⁹ Comments of The International Bridge, Tunnel & Turnpike Association, WT Docket at No. 25-110 (filed April 28, 2025); WISPA Comments at 3; ITI Comments at 2-4; Alliance for Automotive Innovation Comments at 6; EEI Comments at 2-4 (noting that some new PNT services would "would result in interference or create unacceptable restrictions").

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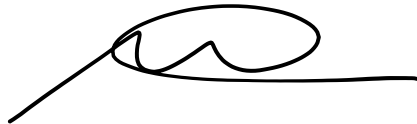
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about a PNT complement. The government would not pick the winning technology or mandate certain technologies but instead identify various diverse technologies that can be readily implemented to create a redundant, resilient PNT architecture and that are not disruptive to current spectrum users.

III. Conclusion

We appreciate the Commission's attention to facilitating the responsible deployment of PNT solutions, and we look forward to working with the Commission to achieve this goal. For any questions, please reach out to me at mfurlow@uschamber.com.

Sincerely,

A handwritten signature in black ink, consisting of a series of loops and a long horizontal stroke extending to the right.

Matt Furlow
Senior Director and Policy Counsel
U.S. Chamber of Commerce