



# PUBLIC NOTICE

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## WIRELESS TELECOMMUNICATIONS BUREAU SEEKS COMMENT ON THE NATIONAL FOOTBALL LEAGUE'S REQUEST TO EXTEND WAIVER OF SECTION 96.39(C)(2) OF THE COMMISSION'S RULES

WT Docket No. 21-111

Comments Due: July 11, 2022

Reply Comments Due: July 18, 2022

On July 9, 2021, the Wireless Telecommunications Bureau (Bureau) granted the National Football League (NFL) a conditional waiver of section 96.39(c)(2) of the Commission's rules<sup>1</sup> governing the Citizens Broadband Radio Service.<sup>2</sup> The waiver allowed the NFL to continue operating its coach-to-coach communications systems in the event of a localized internet outage in NFL stadiums, during NFL football games but after authority to operate within the stadium had been obtained from a Spectrum Access System (SAS).<sup>3</sup> The waiver period was limited to the 2021-2022 season and expired on February 13, 2022, after the conclusion of Super Bowl LVI.<sup>4</sup>

On May 5, 2022, the National Football League (NFL) filed a request to extend the waiver through the end of the 2025 Super Bowl.<sup>5</sup> The NFL contends that an extension of the conditional waiver is needed to address the possibility that multiple, simultaneous Internet failures during or immediately prior to the commencement of a football game could sever the connection between its coach-to-coach communications system and its SAS.<sup>6</sup> The NFL also asserts that an extension will allow it to assess whether a tertiary level of ISP redundancy is required to support its coach-to-coach communications system in the long-term.<sup>7</sup>

The Bureau seeks comment on the NFL's request. To develop a complete record on the issues presented by this request, the proceeding will be treated, for *ex parte* purposes, as a "permit-but-disclose"

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<sup>1</sup> 47 CFR § 96.39(c)(2).

<sup>2</sup> *The National Football League Request for Waiver of Section 96.39(c) of the Commission's Rules*, WT Docket No. 21-111, Order, 36 FCC Rcd 10489 (WTB 2021) (*NFL Waiver Order*).

<sup>3</sup> *NFL Waiver Order* at 1.

<sup>4</sup> *Id.* at 3.

<sup>5</sup> Request of the National Football League for Extension of Waiver Grant, WT Docket No. 21-111 (filed May 5, 2022), <https://files.fcc.gov/ecfs/download/abf2d9c8-f474-4e9e-96ab-76b9b0d2d641?orig=true&pk=cb77b2ec-1a58-dbc6-139b-ad192cfd5d9b> (*NFL Waiver Extension Request*).

<sup>6</sup> See *NFL Waiver Extension Request* at 2. The NFL notes that it was able to operate its coach-to-coach communications system without resorting to the authority conferred by the conditional waiver during the 2021-22 NFL season. See *NFL Waiver Extension Request* at 4.

<sup>7</sup> *Id.* at 5-6.

proceeding in accordance with Section 1.1200(a) of the Commission's rules, subject to the requirements under Section 1.1206(b). Parties should file all comments and reply comments in **WT Docket 21-111**.

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*Filing Requirements.* Parties may file comments, identified by **WT Docket No. 21-111**, by any of the following methods:

- Electronic Filers: Comments may be filed electronically using the internet by accessing the ECFS: <https://www.fcc.gov/ecfs/>.
- Paper Filers: Parties who choose to file by paper must file an original and one copy of each filing.

Filings can be sent by commercial courier or by the U.S. Postal Service. All filings must be addressed to the Commission's Secretary, Office of the Secretary, Federal Communications Commission.

- Commercial deliveries (other than U.S. Postal Service Express Mail and Priority Mail) must be sent to 9050 Junction Drive, Annapolis Junction, MD 20701.
- U.S. Postal Service First-Class, Express, and Priority mail must be addressed to 45 L Street, NE, Washington, DC 20554.
- Effective March 19, 2020, and until further notice, the Commission no longer accepts any hand or messenger delivered filings. This is a temporary measure taken to help protect the health and safety of individuals, and to mitigate the transmission of COVID-19. See FCC Announces Closure of FCC Headquarters Open Window and Change in Hand-Delivery Policy, Public Notice, DA 20-304 (March 19, 2020). <https://www.fcc.gov/document/fcc-closes-headquarters-open-window-and-changes-hand-delivery-policy>.
- During the time the Commission's building is closed to the general public and until further notice, if more than one docket or rulemaking number appears in the caption of a proceeding, paper filers need not submit two additional copies for each additional docket or rulemaking number; an original and one copy are sufficient.

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*Additional Information.* For further information regarding this Public Notice, please contact Paul Powell, Associate Chief, Mobility Division, Wireless Telecommunications Bureau at [Paul.Powell@fcc.gov](mailto:Paul.Powell@fcc.gov) or (202) 418-1613.

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