



PUBLIC NOTICE

Federal Communications Commission
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WIRELESS TELECOMMUNICATIONS BUREAU AND OFFICE OF ENGINEERING AND TECHNOLOGY ANNOUNCE CERTIFICATION RENEWAL FOR SPECTRUM ACCESS SYSTEM ADMINISTRATOR KEY BRIDGE WIRELESS LLC

GN Docket No. 15-319

I. INTRODUCTION

1. With this *Public Notice*, the Wireless Telecommunications Bureau (WTB) and the Office of Engineering and Technology (OET) of the Federal Communications Commission (Commission or FCC) announce that Key Bridge Wireless LLC (Key Bridge) is approved to continue operating as a Spectrum Access System (SAS) administrator in the 3.55–3.7 GHz band (3.5 GHz band) for an additional five-year term.¹ After reviewing Key Bridge’s renewal submission, in consultation with the National Telecommunications and Information Administration (NTIA) and the Department of War (DoW), WTB and OET find that Key Bridge has satisfied the compliance obligations set forth in the *SAS Renewal Procedures Notice* and is therefore authorized to continue providing commercial services until **March 9, 2031**, subject to the conditions set forth herein.²

II. BACKGROUND

2. SAS administrators must be authorized by the Commission to operate a SAS.³ In the *2015 Report and Order*, the Commission directed WTB and OET, in consultation with the DoW and the NTIA, to oversee the review, certification, and approval of SAS administrators in the 3.5 GHz band.⁴ WTB and OET have approved eight SAS administrators for full commercial deployment, and six of the SASs still operate today. On March 9, 2021, WTB and OET approved Key Bridge to operate for a five-year term.⁵

¹ See 47 CFR § 96.63(e).

² *Wireless Telecommunications Bureau and Office of Engineering and Technology Announce Renewal Procedures For Spectrum Access System Administrators in the 3.5 GHz Band*, GN Docket No. 15-319, Public Notice, 39 FCC Rcd 13378 (WTB/OET 2024) (*SAS Renewal Procedures Notice*). SAS administrators that seek renewal of their terms to conduct full commercial operations must certify their compliance with all renewal obligations in a filing with the Commission no fewer than 14 days before the expiration of their existing certifications. See *SAS Renewal Procedures Notice*, 39 FCC Rcd at 13381, para. 7.

³ 47 CFR § 96.3 (defining a SAS administrator as “[a]n entity authorized by the Commission to operate an SAS in accordance with the rules and procedures set forth in § 96.63”).

⁴ See *Amendment of the Commission's Rules with Regard to Commercial Operations in the 3550-3650 MHz Band*, GN Docket No. 12-354, Report and Order and Second Further Notice of Proposed Rulemaking, 30 FCC Rcd 3959, 4067, paras. 369-73 (2015) (*2015 Report and Order*). See also 47 CFR §§ 0.241(j), 0.331(f).

⁵ See *Wireless Telecommunications Bureau and Office of Engineering and Technology Approve Spectrum Access System Administrator Key Bridge Wireless for Full Scale Commercial Deployment in the 3.5 GHz Band*, GN Docket No. 15-319, Public Notice, 36 FCC Rcd 4880 (WTB/OET 2021) (*Key Bridge Authorization*).

3. The five-year term for Key Bridge expired on March 9, 2026.⁶ Pursuant to 47 CFR § 96.63 and the *SAS Renewal Procedures Notice*, Key Bridge submitted a timely application to renew its SAS certification for another five-year term.⁷

III. DISCUSSION

4. Based on our review of the information contained in Key Bridge's renewal certification filings, as well as all relevant information previously submitted in this proceeding, we hereby renew the certification of Key Bridge for another five-year term. Specifically, Key Bridge may continue to operate its SAS on a commercial basis subject to the following compliance obligations, which remain consistent with those described in the *SAS Approval Public Notice* and our rules:⁸

- Key Bridge must continue to comply with all current and future Commission rules and policies, as well as comply with all instructions issued by WTB, OET, or the Enforcement Bureau (EB), including any processes for interference reporting, consistent with sections 0.241(j) and 0.331(f) of the Commission's rules⁹ applicable to SASs on an ongoing basis.¹⁰ Key Bridge must also comply with requests for additional information from the Commission, WTB, OET, or EB.
- Key Bridge must ensure that the information on file with the Commission related to its business operations and ownership structure remains accurate.¹¹ If any such information has changed, Key Bridge must update the information on file with the Commission in its renewal application via a supplemental filing in GN Docket No. 15-319. Once Key Bridge becomes aware that there will be a material change to its ownership information, business structure, or financial capability to operate a SAS, after renewal, we expect Key Bridge to discuss such changes with relevant WTB and OET staff prior to the change taking effect, and Key Bridge must fully disclose this change in a supplemental filing in GN Docket No. 15-319.
- Consistent with existing requirements, if Key Bridge plans to make substantive changes to its system, for example, to comply with new releases of industry standards, it must supplement or amend its filings to describe those changes. If no such changes are planned or known at

⁶ See *Key Bridge Authorization*.

⁷ See 47 CFR § 96.63(e). Key Bridge was required to file its renewal certifications no later than Monday, February 23, 2026, and met that deadline. *SAS Renewal Procedures Notice*, 39 FCC Rcd at 13381, para. 7 & n.23; see also Letter from Jesse Caulfield, CEO, Key Bridge Wireless LLC, to Marlene H. Dortch, Secretary, FCC, GN Docket No. 15-319 (filed Jan. 27, 2026).

⁸ See *Key Bridge Authorization*, 36 FCC Rcd at 4882-83, para. 5; see also *Wireless Telecommunications Bureau and Office of Engineering and Technology Conditionally Approve Seven Spectrum Access System Administrators for the 3.5 GHz Band*, GN Docket No. 15-319, Public Notice, 31 FCC Rcd 13355, at 13356-58, para. 7 (WTB/OET 2016) (*SAS Conditional Approval Public Notice*).

⁹ See 47 CFR §§ 0.241(j), 0.331(f) (delegating authority to WTB/OET to oversee the SAS approval process and facilitate the testing and development of multiple SAS operators).

¹⁰ See, e.g., 47 CFR §§ 96.53-96.65. In August 2024, the Commission issued a *Notice of Proposed Rulemaking and Declaratory Ruling* that sought comment on a broad range of issues in the 3.5 GHz band. *Promoting Investment in the 3550-3700 MHz band*, GN Docket No. 17-258, Notice of Proposed Rulemaking and Declaratory Ruling, 39 FCC Rcd 9775 (2024).

¹¹ This includes information submitted by Key Bridge in response to the *SAS Administrator Application Notice* and subsequent WTB/OET PNs, as well as any changes and supplements that information that were subsequently filed in GN Docket No. 15-319. See *Wireless Telecommunications Bureau and Office of Engineering and Technology Establish Procedure and Deadline for Filing Spectrum Access System (SAS) Administrator(s) and Environmental Sensing Capability (ESC) Operator(s) Applications*, GN Docket No. 15-319, Public Notice, 30 FCC Rcd 14170 (WTB/OET 2015) (*SAS Administrator Application Notice*).

the time of renewal, Key Bridge must certify that it will supplement or amend its filings as soon as is practicable if such changes occur during its renewal term.¹²

- Key Bridge must continue to comply with any expanded SAS capabilities or obligations—including the provision of service in additional U.S. Territories and Possessions¹³ and the support of spectrum manager leasing¹⁴—authorized since its initial certification.
- Key Bridge must continue to protect current and future federal incumbent operations in and near the 3.5 GHz band, as set forth in the Commission’s rules and subsequent WTB/OET actions.¹⁵ Examples of subsequent WTB/OET actions include the use of the Telecommunications Advanced Research and Dynamic Spectrum Sharing System

¹² Before WTB and OET approve the use of new or modified SAS features, the SAS operator must demonstrate that the modified SAS will continue to comply with the Commission’s rules, and it may be required to submit its systems for additional testing. Upon request, the SAS operator must provide external testing interfaces to enable WTB and OET, in collaboration with NTIA and DoD, to verify that the proposed modifications comply with the relevant rules as specified by the Commission. See, e.g., *Key Bridge Authorization*, 36 FCC Rcd at 4882-83, para. 5; *Wireless Telecommunications Bureau and Office of Engineering and Technology Approve Four Spectrum Access System Administrators for Full Scale Commercial Deployment in the 3.5 GHz Band and Emphasize Licensee Compliance Obligations in the 3650-3700 MHz Band Under Part 96*, GN Docket No. 15-319, Public Notice, 35 FCC Rcd 117, 118-20, para. 5 (WTB/OET 2020); *Wireless Telecommunications Bureau and Office of Engineering and Technology Approve Spectrum Access System Administrator Amdocs for Full Scale Commercial Deployment in the 3.5 GHz Band*, GN Docket No. 15-319, Public Notice, 35 FCC Rcd 3687, 3688-90, para. 5 (WTB/OET 2020); *Wireless Telecommunications Bureau and Office of Engineering and Technology Approve Spectrum Access System Administrator Red Technologies for Full Scale Commercial Deployment in the 3.5 GHz Band, to Support Spectrum Manager Leasing, and to use Key Bridge Wireless LLC’s Environmental Sensing Capability*, GN Docket No. 15-319, Public Notice, 38 FCC Rcd 8549, 8551-52, para. 5 (WTB/OET 2023); *Wireless Telecommunications Bureau and Office of Engineering and Technology Approve Spectrum Access System Administrator Nokia for Full Scale Commercial Deployment in the 3.5 GHz Band and to Support Spectrum Manager Leasing*, GN Docket No. 15-319, Public Notice, DA 25-1057, at 3-4, para. 5 (WTB/OET 2025).

¹³ For example, Federated, Google, and Sony received approval to operate in American Samoa after initial SAS certification. See *Wireless Telecommunications Bureau and Office of Engineering and Technology Approve Spectrum Access System Administrator Federated Wireless for Full Scale Commercial Deployment in the 3550-3650 MHz Band in American Samoa*, GN Docket No. 15-319, Public Notice, 36 FCC Rcd 8236 (WTB/OET 2021); *Wireless Telecommunications Bureau and Office of Engineering and Technology Approve Spectrum Access System Administrator Google for Full Scale Commercial Deployment in the 3.5 GHz Band in American Samoa*, GN Docket No. 15-319, Public Notice, 36 FCC Rcd 8467 (WTB/OET 2021); *Wireless Telecommunications Bureau and Office of Engineering and Technology Approve Spectrum Access System Administrator Sony, Inc. for Full Scale Commercial Deployment in the 3.5 GHz Band in American Samoa*, GN Docket No. 15-319, Public Notice, 37 FCC Rcd 9269 (WTB/OET 2022).

¹⁴ See *The Wireless Telecommunications Bureau and the Office of Engineering and Technology Approve Spectrum Access System Administrators Amdocs, Federated Wireless, Inc., Google, Key Bridge, and Sony, Corp. to Support Spectrum Manager Leasing*, GN Docket No. 15-319, Public Notice, 37 FCC Rcd 7934 (WTB/OET 2022).

¹⁵ See 47 CFR § 96.15.

(TARDyS3) scheduling portal for federal coordination,¹⁶ as well as the modified aggregate interference model to protect federal operations in the 3.5 GHz Band.¹⁷

5. The above conditions will ensure that Key Bridge will continue to comply with the Commission's rules. A SAS administrator's certification may be revoked at any time if the SAS administrator fails to comply with the Commission's rules and guidance on an ongoing basis.

By the Chief, Wireless Telecommunications Bureau, and the Chief, Office of Engineering and Technology.

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¹⁶ See *Promoting Investment in the 3550-3700 MHz Band; 3.5 GHz SAS and ESC Applications*, GN Docket Nos. 17-258 and 15-319, Order, 38 FCC Rcd 7628 (WTB/OET 2023); see also Letter from Charles Cooper, Assoc. Admin., Office of Spectrum Mgt., NTIA, to Ronald T. Repasi, Chief (Acting) OET, and Donald Stockdale, Jr., Chief, WTB, FCC (Jan. 22, 2020), <https://www.ntia.doc.gov/fcc-filing/2015/ntia-letter-fcc-commercial-operations-3550-3650-mhz-band>; <https://www.fcc.gov/ecfs/filing/101220466714222>.

¹⁷ See *Wireless Telecommunications Bureau and Office of Engineering and Technology Approve Certified SAS Administrators to use Modified Aggregate Interference Model*, GN Docket Nos. 17-258 and 15-319, Public Notice, DA 24-643 (WTB/OET 2024).