Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of	)	
	)	
Landover Saturn 5 LLC	)	
	)	MB Docket No. 26-_____
Request for Rulemaking to Permit the	)	
Repurposing of UHF Channels 28–36 for	)	
Flexible 5G/6G Broadband Use and Approval	)	
of a Public-Private Clearing and Repacking	)	
Framework	)	

To: The Commission

REQUEST FOR RULEMAKING TO PERMIT THE REPURPOSING OF UHF CHANNELS 28-36 FOR FLEXIBLE 5G/6G BROADBAND USE

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SUMMARY

The United States is entering an era of unprecedented demand for low-band spectrum as wireless networks evolve toward 6G, satellite direct-to-device connectivity, AI infrastructure, and ubiquitous broadband coverage. Low-band spectrum provides the essential coverage layer for these technologies because of its superior propagation characteristics, indoor penetration, and ability to support wide-area connectivity with fewer network sites. Yet despite rapidly growing demand, the supply of low-band spectrum available for flexible wireless use remains limited. At the same time, valuable spectrum within the UHF broadcast band remains underutilized as the economics of traditional over-the-air broadcasting continue to decline in the face of significantly reduced linear advertising revenue, cord-cutting, and migration to streaming platforms.

This proceeding presents a timely opportunity for the FCC to address both realities. Landover Saturn 5 LLC respectfully requests that the Commission initiate a rulemaking to permit the repurposing of UHF Channels 28–36 (554–608 MHz) into a contiguous nationwide block of low-band spectrum for flexible 5G and future 6G use. Clearing these nine channels would create approximately 50 MHz of usable spectrum representing 17 billion MHz-POPs nationwide, providing a critical new coverage layer for next-generation wireless networks.

Unlike prior spectrum repurposing efforts, this initiative would be implemented through a public-private partnership that leverages private capital and expertise rather than federal funding. Landover would serve as a neutral Sponsor responsible for coordinating Broadcaster participation, managing spectrum clearing and repacking below Channel 28, and implementing the monetization of the repurposed spectrum, subject to Commission oversight. This approach allows the repurposing to be completed more quickly and efficiently than a traditional FCC-managed auction and repack process.

The Commission's 600 MHz Broadcast Incentive Auction 1001 demonstrated the value of repurposing broadcast spectrum for wireless use but required years of preparation and over $13 billion in federally funded transition costs. By contrast, the Landover framework would be privately financed and could be completed within approximately 24-36 months. The public-private partnership spectrum proceeds are projected to return more than $15 billion directly to the U.S. Treasury—exceeding the net fiscal return of Auction 1001 twofold—while imposing no repack costs or burdens on the federal government.

The plan also provides meaningful benefits for Broadcasters. Advances in ATSC 3.0 technology now allow multiple stations to share a single channel while maintaining full-market service and programming continuity. Participating Broadcasters would voluntarily monetize underutilized spectrum in Channels 28 to 36 while continuing to deliver their broadcast signals through channel sharing below Channel 28. This approach enables Broadcasters to convert under-monetized spectrum assets into capital at a time when industry revenues are under significant pressure, while preserving service to the public viewers and communities.

For these reasons, Landover respectfully requests that the Commission initiate a rulemaking to permit flexible wireless use of Channels 28–36, authorize voluntary Broadcaster participation and ATSC 3.0 channel-sharing arrangements, designate Landover as the Sponsor responsible for coordinating repacking and monetization under Commission oversight, and approve a framework for licensing the resulting spectrum and distributing proceeds, including a substantial payment to the U.S. Treasury.

Approving this proposal would unlock a significant new block of low-band spectrum, accelerate next-generation wireless deployment, preserve broadcast services, and generate substantial fiscal benefits for the American public. Landover stands ready to begin implementing this public-private partnership immediately upon Commission authorization.

I. INTRODUCTION

Landover Saturn 5 LLC ("Landover") respectfully submits this request for the Commission to initiate a rulemaking and issue implementing orders with the goal of repurposing a contiguous, nationwide 54-MHz block of underutilized spectrum from nine contiguous television broadcast channels, Channels 28 through 36 (554–608 MHz), across the United States. Increased spectrum availability would facilitate advanced use cases, including flexible 5G and 6G wireless broadband service. This repurposing will be accomplished through a public-private partnership that would enable Landover to coordinate and facilitate Broadcaster participation, spectrum clearing, channel repacking operations below Channel 28, monetization of the repurposed wireless spectrum and distribution of the proceeds to all the relevant stakeholders, beginning with the U.S. Department of the Treasury ("U.S. Treasury"), which will receive the largest portion of the proceeds.

Landover is uniquely positioned to drive this strategic initiative. It is the architect of this 600 MHz band repurposing, including the aggregation structure, repacking logistics and engineering optimization and standards creating the band plan. While Landover is not currently a television broadcast license holder, it has standing to make this request as a direct consumer and developer of: (i) broadcast television spectrum; and (ii) low-band wireless spectrum addressing national 6G deployment goals. It has the financial resources, technical expertise, and Broadcaster relationships necessary for the success of this ambitious initiative. This request is not without precedent and serves the public interest. The Commission's Broadcast Incentive Auction ("Auction 1001") established national authority for repurposing broadcast spectrum for commercial wireless broadband use. However, the model advanced here (i.e., private negotiation and clearing administered by a Commission-endorsed public-private Sponsor) is novel, materially more efficient, fiscally sound, and fully aligned with the current Administration's focus on private-

sector execution of national broadband priorities. As demonstrated herein, the public benefits are overwhelming.

II. BACKGROUND

Landover and its leadership have successfully built and exited multiple U.S. nationwide and European wireless networks across diverse spectrum bands. For greater than a decade, Landover has actively pursued 600 MHz spectrum and cultivated substantial institutional relationships with U.S. Broadcasters through negotiations on various initiatives, including executing term sheets with the largest tier 1 Broadcasters and independent and rural Broadcasters.

Landover has developed and financed the "Watson Tool," a proprietary software optimization tool for repurposing the 600 MHz low-band broadcast spectrum.[1] This work has included designing a nationwide channel-repacking approach below Channel 28 utilizing ATSC 3.0. Landover is currently engineering and solving for the repack and conducting population-based interference and contour-overlap modeling. Landover has also developed a market-based Broadcaster participation framework, along with an architecture focused on protecting Broadcaster revenue and ensuring service continuity throughout the transition.

Landover has borne the full cost of engineering, policy development, economic modeling, and creation of a Broadcaster negotiation template for this repurposing initiative. Its role is strictly independent—Landover has no ownership interest or affiliation with any broadcast network, station group, Multichannel Video Programming Distributor ("MVPD"), wireless carrier, or

[1] The Watson Tool includes a proprietary software toolchain and algorithmic solutions based on high-fidelity propagation simulations and a TV network digital twin, utilizing proprietary high-resolution GEO data and RF propagation models. Those solutions are uncovering tighter, less conservative, advanced and highly efficient TV spectrum reuse opportunities. The Watson Tool analyzes interference across hundreds of stations simultaneously to evaluate targeted, ATSC 3.0-optimized, local RF optimization actions—such as pattern shaping, Single Frequency Networks ("SFN") conversions, Multiple-Input Multiple Output ("MIMO") modeling, and channel sharing. Crucially, each local modification triggers new interference predictions, creating a continuous loop of architectural scenarios that constantly feed our Large Neighborhood Search based global algorithmic engine. The resulting solutions can efficiently handle hundreds of Broadcaster stations and hundreds of thousands of possible scenarios to find optimal spectrum re-packing outcomes at a global level.

tower-infrastructure operator. This structural neutrality enables Landover to serve as a neutral Sponsor of Broadcaster participation agreements, repacking sequencing, spectrum sale transactions, and funds distribution based upon mutually agreed terms and conditions among the relevant stakeholders.

While Landover is not a broadcast licensee and maintains no ownership affiliation with any television station or station group, this initiative is not conceived as a unilateral spectrum extraction effort, nor one in which the Commission would compel Broadcaster divestiture absent broad industry alignment. To the contrary, Landover is working in close coordination with Broadcasters, engaging them as commercial partners under voluntary, negotiated market-based agreements that recognize and preserve their economic interests and ongoing service obligations. Only upon securing substantial Broadcaster participation—sufficient to support a uniform nationwide repurposing and repacking framework—would Landover request, if necessary, that the Commission assist in relocating any remaining non-participants to available channels below 28, and solely to the extent required to complete the transition in an orderly fashion. By developing and creating substantial industry buy-in, Landover would ensure that the number of non-participants would be limited. Landover has thus created and developed a genuine public-private partnership with participating Broadcasters and the Commission, structured to ensure that cooperation, consent and transparent commercial terms drive the transition rather than mandates or coercion.

III. SITUATIONAL NEED

A. Wireless Industry Demand.

Demand curves published by national and regional wireless carriers confirm that low-band spectrum scarcity is both ongoing and intensifying, particularly for applications requiring wide-area coverage and building penetration. Current projections show that by 2029 the 5G low-band

traffic in the United States will increase fivefold, while the 600 MHz spectrum cleared through Auction 1000 has already reached saturation across primary and secondary markets, limiting effective deployment of non-terrestrial networks ("NTNs") and terrestrial hybrids. CTIA's most recent forecast further indicates that low-band 5G and emerging 6G requirements will exceed existing national allocations by approximately 100 to 150 MHz within the next three years, driven by the need for resilient connectivity in rural, suburban, and indoor environments.[2]

In this ecosystem, expanding low-band availability—such as through clearing TV Channels 28 to 36—is not merely incremental; it is essential to maintaining the United States global wireless competitiveness. Expanding availability will improve network-deployment cost efficiency for satellite direct-to-cell ("D2C") and terrestrial 5G and 6G systems and accelerate last-mile broadband access in rural and Tribal communities without requiring full fiber build-out, while enabling seamless integration with NTNs under the FCC's Supplemental Coverage from Space ("SCS") framework (47 CFR §25.202). This expansion is particularly vital as the United States emerges as a leader in satellite-based 6G and AI in space, bolstered by recent policy directives like the December 2025 *Winning the 6G Race* Executive Order, and initiatives from firms such as SpaceX and xAI for constructing orbital datacenters. Low-band spectrum in the 600 MHz range is also essential for enabling wide-area NTN deployments and orbital edge computing. According to a research study published by The Brattle Group on behalf of the CTIA titled *How Much Licensed Spectrum is Needed to Meet Future Demands for Network Capacity?*, industry projections indicate a need for at least 100 MHz of additional low-band spectrum to meet 6G

[2] Coleago Consulting and the GSMA, Vision 2030: Low-Band Spectrum for 5G (June 2022).

coverage and capacity requirements by 2029,[3] ensuring propagation advantages for satellite-to-device links and AI-driven network optimization.

Prominent industry participants have identified increased spectrum capacity as a requirement for the transition to 6G and AI technologies. An article published by RCR News discussing Qualcomm's vision toward innovation concluded:

> The race to define and deploy 6G is intensifying. Countries and regions are investing heavily in research, while standardization efforts are actively underway. At the heart of 6G's success lies the availability of spectrum — an enabler of technological progress and economic growth.
>
> With commercial deployments expected in 2030, the long spectrum availability timeline underscores the urgency of current efforts. To stay ahead, the mobile industry must successfully secure fresh spectrum that meets the evolving needs of communication and capacity.[4]

Furthermore, an Ericsson white paper illustrates the importance of low-band spectrum in current and future networks:

> Low-band spectrum or spectrum in the sub-1 GHz range, and in particular, spectrum in the 600 MHz and 700 MHz range provide the basic coverage layer for mobile networks. This is the only range that can reach remote and deep rural areas, helping to bridge the digital divide and bring equal opportunities to all parts of society. Digitalization of rural areas by smart agriculture to achieve net zero emission targets also requires sub-1GHz spectrum. Additionally, connectivity everywhere while on the move (for example, rural roads) can only be achieved with enough spectrum in this range. Sub-1 GHz is not only critical for rural areas but also for deep indoor coverage in dense areas (for example, in basements). Due to the large propagation characteristics of this range, nationwide mobile licenses represent the most suitable authorization regime.[5]

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[3] Coleman Bazelon and Paroma Sanyal of the Brattle Group on behalf of the CTIA, How Much Licensed Spectrum is Needed to Meet Future Demands for Network Capacity? (April 17, 2023).

[4] RCR Wireless News, *6G Technology and Spectrum Needs: Unlocking the Next Generation of Wireless Connectivity* (Dec. 20, 2024).

[5] Ericsson White Paper, *6G Spectrum – Enabling the Future Mobile Life Beyond 2030* (May 2024).

The significance of this nationwide spectrum aggregation is further underscored by recent market activity and regulatory developments that vividly demonstrate strong demand for 6G, Artificial Intelligence, and Machine-to-Machine ("M2M") capacity. EchoStar recently announced that it has agreed to sell bundles of nationwide mid-band and low-band spectrum licenses to AT&T and SpaceX for over $42 billion in the aggregate, including key low-band assets critical for D2C satellite operations. These high-value transactions reflect not only strong commercial demand for low- to mid-band airwaves—which serve as a backbone for scalable 5G and future 6G deployments, including NTN hybridization under 3GPP Release 17+ standards—but also a readiness by major network operators, satellite providers, and others to acquire precisely the kind of low-band spectrum that remains scarce under current allocations. Making low-band spectrum available through this public-private partnership will expedite the process and is achievable over the next 24 - 36 months. This is plainly superior to a traditional auction process that would take twice the time and likely could not commence until the next decade. Such increased spectrum availability would facilitate advanced use cases such as orbital edge computing, IoT proliferation, and interference-mitigated SCS operations as authorized by recent FCC waivers (e.g., DA 25-197 and DA 26-36), while solidifying U.S. leadership in satellite 6G and space-based AI through enhanced low-band resources in the 600 MHz band.

Taken together, these recent transactions and initiatives confirm that the need for additional flexible mid- and low-band capacity is both immediate and large-scale. The recent transactions also demonstrate how private enterprise can solve technical complexities that drive value to end users as well as the sellers of spectrum. By repurposing UHF Channels 28–36 under the model proposed in this Application, the Commission would not only unlock a significant new low-band resource for commercial use but would also respond directly to current market demand and

ongoing regulatory momentum in favor of expanded wireless infrastructure benefiting the American consumer.

B. Broadcast Industry Contraction.

The economics of over-the-air broadcasting have shifted markedly in recent years. The stability of traditional distribution-based revenue streams has been under pressure. Linear advertising revenues have declined worldwide by roughly 28% over the past decade as audiences and advertising budgets migrate to streaming and digital platforms.[6] At the same time, the traditional MVPD ecosystem is contracting rapidly, with Pay TV subscribers declining approximately 8% per year and total penetration falling below 50% of U.S. households.[7]

Ongoing station-group consolidation has further compressed independent monetization leverage, making it increasingly difficult for individual Broadcasters to maintain historical economic margins under the long-standing over the air broadcasting business model. The broadcast industry contraction is in sharp contrast to the accelerating need to reallocate underutilized mid- to low-band spectrum capacity to support advanced wireless broadband, D2C connectivity, and next-generation mobility applications.

ATSC 3.0 technology provides a technically efficient pathway for channel sharing and multicasting below Channel 28, allowing Broadcasters to retain full-service presence and programming continuity without requiring exclusive control over an entire 6-MHz channel.

Under Landover's plan, participating Broadcasters will allow their licensed spectrum to be utilized at its highest value, while continuing to provide full-market over-the-air service through channel sharing at market-rate subchannel lease terms, eliminating anti-competitive pricing risk

[6] Research Live, *Linear TV Ad Spending Drops Globally*, (Sept.5, 2025); Stuart Mitchell, *Ethical Marketing News, Global Linear TV Ad Spend Drops to $143.9 Billion This Year as Viewers Increasingly Transition to Streaming*, (Sept. 28, 2025).

[7] Alix Partners, *2025 Media & Entertainment Industry Prediction Report*.

and ensuring equitable access to ATSC 3.0 hosting. This framework delivers direct financial and strategic upside for Broadcasters and their stakeholders. Broadcasters would receive meaningful and much needed market-based compensation for relinquishing spectrum **"early"** (handing in licenses prior to 2030). This would unlock capital at a time when linear advertising decline, cord-cutting, and audience migration to streaming platforms continue to pressure station margins and reduce new investment flexibility. Under the Landover public-private model, Broadcasters retain their market presence and program distribution rights by transitioning to shared ATSC 3.0 capacity below Channel 28, at no cost to Broadcasters. This allows them to continue delivering their full broadcast signal while simultaneously aligning with industry-wide movement toward streaming distribution.

In other words, Broadcasters will convert under-monetized spectrum into immediate enterprise value without forfeiting brand identity, local programming obligations, retransmission eligibility, or the growing opportunities that ATSC 3.0 offers for data, multicast, and digital-first delivery. This public-private partnership would provide meaningful liquidity today and fund the development of a nationwide broadcast-enabled data network, providing opportunity for participating Broadcasters to expand beyond traditional linear television into advanced data distribution services, including multicast data delivery, software distribution, and other emerging ATSC 3.0-enabled applications.

IV. REPURPOSING PROCESS AND PROPOSED COMMISSION ACTIONS

Landover hereby respectfully requests that the Commission approve and implement the following integrated repurposing process, which combines regulatory action, private-sector execution and Commission oversight with the participation of a sufficient number of Broadcasters willing to engage in the proposed nationwide repurposing of Channels 28-36.

A. Commission Initiation of Rulemaking and Adoption of Governing Framework.

The Commission would initiate this process and issue a Public Notice seeking comment on the proposed repurposing framework. Provided there is some level of public support, and that a sufficient number of Broadcasters express interest in participating in the repurposing process, the Commission would then issue a Notice of Proposed Rulemaking to amend the U.S. Table of Frequency Allocations to permit flexible wireless use of Channels 28–36 and to establish the rules governing clearing, relocation, licensing, and proceeds distribution. Following review of the record, the Commission would adopt an Order approving the repurposing process, setting forth the conditions, safeguards, and timelines applicable to Broadcasters, wireless licensees, and Landover. The Commission would retain authority to issue subsequent implementing orders, clarifications, and public notices as needed to address technical, procedural, or sequencing issues during execution.

B. Authorization of Broadcaster Participation and Voluntary Commercial Transactions.

The Commission would approve a voluntary participation framework under which eligible Broadcasters operating on Channels 28–36 may enter into negotiated commercial agreements with Landover to relinquish spectrum usage rights in exchange for participation in monetization proceeds. Approximately 450 full-power digital television stations and 126 Class A stations are potentially subject to clearing, although broadcast ownership concentration makes participation by a relatively small number of large station groups sufficient to support nationwide repurposing. The ten largest broadcast ownership groups collectively account for approximately 62% of the affected spectrum. Landover expects to secure anchor commitments from a number of these Broadcasters, which would encourage and facilitate broader participation across remaining groups and stations.

C. Approval of Broadcaster Relocation and ATSC 3.0 Channel-Sharing Arrangements.

The Commission would authorize participating Broadcasters to surrender existing broadcast licenses within Channels 28 to 36 or modify authorizations and continue broadcast service through relocation to spectrum below Channel 28 or through ATSC 3.0 channel-sharing arrangements. This approval would preserve full-market service, retransmission consent rights, and viewer access while enabling significant spectrum compression. To the extent necessary to complete clearing after substantial voluntary participation has been achieved, the Commission would also authorize relocation of a limited number of non-participating Broadcasters to comparable spectrum below Channel 28, consistent with technical feasibility and service-continuity protections. Secondary services impacted by the repacking will be accommodated at the same standards established in Auction 1000 / 1001.

D. Designation of Landover as Sponsor and Spectrum Monetization Manager.

The Commission would formally designate Landover as the neutral Sponsor responsible for coordinating Broadcaster negotiations, engineering the broadband plan, repacking logistics, and transition sequencing, subject to FCC oversight. Landover would also manage the monetization process for the repurposed spectrum subject to Commission-approved rules and guardrails designed to promote transparency, competition, and maximization of spectrum value. Clearing Channels 28–36 would result in 50 MHz of usable flexible-use spectrum, representing 17 billion MHz-POPs of newly available low-band capacity. Landover would enter into binding agreements with third-party purchasers for this spectrum pursuant to an organized, fair and transparent process.

E. Authorization and Processing of FCC Applications for Broadcasters and Wireless Licensees.

The Commission would accept and process all necessary applications from participating Broadcasters and third-party purchasers of 5G, 6G and Mobile Broadband ("MBB") licenses within the repurposed band. Broadcaster filings would address license surrender, modification or channel-sharing arrangements, while wireless applicants would seek initial licenses or assignments consistent with the approved band plan. All 5G, 6G and MBB licenses issued to third-party buyers would be subject to the Commission's standard service rules, buildout requirements, renewal obligations, and ongoing compliance conditions applicable to flexible-use spectrum established under the Auction 1001 construct.

F. Approval of Proceeds Distribution and Treasury Allocation.

The Commission would approve the framework for distributing proceeds generated through spectrum monetization, subject to Commission oversight. Spectrum sales proceeds will be distributed to the public-private stakeholders on a prioritized basis, beginning with the U.S. Government. Subsequently, funds will be allocated to the costs incurred for spectrum clearing, channel moves and the deployment of ATSC 3.0, including customer premises equipment ("CPE"). Next, participating Broadcasters would receive negotiated compensation reflecting their pro-rata spectrum licenses contributed to the aggregation of the 600 MHz nationwide footprint. Finally, the remaining proceeds are allocated to the Sponsor. The monetization process and the management and disbursements of transaction proceeds will be administered through an escrow agent held by a major U.S. money center bank approved by the U.S. Government and Landover.

The largest financial beneficiary is the U.S. Government, with proceeds directed to the U.S. Treasury. Landover, as with the other stakeholders, would receive compensation consistent with their financial investment, administrative responsibilities, and risk assumption, ensuring alignment

of incentives, and completion of the repurposing without federal reimbursement obligations or administrative burden.

G. Issuance of Supplemental Orders Supporting Clearing and Transition.

Finally, the Commission would issue any additional procedural or technical orders necessary to facilitate the repurposing, including ATSC 3.0 conversion, transition timing, viewer continuity, and interference management. These supplementary directives would be limited to implementation support and would follow only upon demonstration of broad Broadcaster participation. This ensures that regulatory actions remain targeted and supportive rather than expansive and burdensome.

V. PUBLIC INTEREST BENEFITS

The proposed repurposing model delivers a compelling set of public-interest benefits that align with the Commission's broadband and spectrum-management priorities and will generate significant revenue for the U.S. Government while materially reducing federal administrative and financial exposure. By structuring the clearing and relocation mechanism as a private-capital undertaking, rather than a federally-funded repack, the plan eliminates the multi-billion-dollar reimbursement obligations incurred in the previous Auction 1001 transition and allows spectrum migration to proceed and contribute greater than $15 billion to the U.S. Treasury.

The transition timeline, supported by a unified clearing Sponsor and Broadcaster-negotiated relocation plan, enables a far more rapid nationwide activation of 5G and 6G services on available low-band frequencies than would be achievable under a conventional, Commission-managed auction and repack sequence.

The Landover public-private partnership spectrum repurposing plan is specifically designed to fully address the needs of rural America and underserved communities. By design, the nationwide footprint encompasses the majority of America's agricultural heartland—the

Breadbasket region—together with rural highways and transportation corridors that currently experience inadequate broadband and wireless service coverage.

In addition to the monetary benefits realized by the U.S. Government and citizens, the increased commerce fostered by the use cases that leverage the repurposed spectrum capacity will drive increased GDP, job growth and the United States' standing on the global competitive stage.

Beyond immediate 5G deployment benefits, the proposed repurposing directly supports the United States' leadership in connectivity, particularly as the global ecosystem begins transitioning toward 6G. Low-band spectrum in and adjacent to the 600 MHz range has become increasingly critical to the future of hybrid terrestrial-satellite networks, including D2C services and AI-enabled space-based infrastructure. Because of its superior propagation characteristics, low-band spectrum uniquely enables seamless integration between terrestrial networks and non-geostationary satellite systems, supporting coverage for massive IoT deployments, autonomous systems and other advanced networks. The United States has already established an early and meaningful lead over China and other global competitors in D2C innovation. This advantage depends heavily on low-band spectrum for reliable, low-power, non-line-of-sight connectivity to everyday devices. Maintaining this lead has direct national security implications, as leadership in low-band hybrid networks will influence global 6G standards, supply-chain resilience, and the security posture of future communications systems. By enabling rapid expansion of this spectrum class, the Commission can help ensure that U.S.-led technologies—not state-directed foreign alternatives—set the technical and operational baseline for the next generation of global wireless infrastructure.

At the same time, the framework ensures preservation of over-the-air broadcasting by enabling stations to continue full-market transmission below Channel 28 through ATSC 3.0 channel-sharing, thus protecting both service reliability and viewer access. In addition, because

the clearing process compresses television operations into a purely sub-Channel 28 configuration, it reduces adjacent-channel and co-channel interference risk relative to the incentive-auction repack footprint. This framework also creates a clean, contiguous low-band block for 5G and 6G deployment, ultimately improving spectral efficiency across both services.

Proceeds generated through subsequent flexible-use licensing will return revenue to the U.S. Treasury, offering a fiscal upside alongside deployment acceleration.

The public-private partnership thus avoids Auction 1001 reimbursement overhead, repack sequencing complexity, and administrative congestion, while accelerating market readiness for next generation 5G and 6G deployments.

Moreover, Auction 1001 ultimately yielded just over $7.3 billion in net proceeds to the U.S. Treasury after accounting for Broadcaster payments and more than $13.2 billion in federally funded repack and transition costs. By contrast, the repurposing framework proposed here is expected to return at least $15 billion or 35% of the gross proceeds realized from the spectrum monetization process to the U.S. Treasury. These proceeds will exceed Auction 1001 in absolute fiscal contribution on a 30% smaller block of spectrum. Because Landover's public-private partnership will finance Broadcaster relocation, channel repacking and ATSC 3.0 transition expenses privately, there will be no federal reimbursements, no repack appropriations and no administrative transition burden placed on the Commission or the U.S. Treasury. The private sector is better positioned to address technical and logistical complexities related to the ATSC 3.0 migration and CPE design, engineering and deployment. Thus, the public-private model delivers both a larger U.S. Treasury revenue, and a dramatically higher net yield once avoided federal expenditures, staff resources, and multi-year repack administration are factored into the equation.

More importantly, the Landover public-private plan would be accomplished in the next 24 – 36 months.

Auction 1001 demonstrated the economic and public-benefit power of broadcast repurposing, but its structure imposed a long, cumbersome, heavily regulated and inefficient process that included 10-stage clearing cycles, 39-month transition timing, and multi-billion-dollar U.S. Treasury reimbursement burdens, and countless hours from FCC staff. In contrast, the model proposed here materially improves upon this precedent as follows:

Factor	**Auction 1001**	**Landover Clearing Model**
Regulatory/Sale Process	>5 Years	24 months
Clearing Time	39 months	36 months
Federal Cost	> $13.2B reimbursed	$0 federal repack burden
Contiguous 5G Allocation	84 MHz	~54 MHz (post-guard band)
Administrator	FCC-managed	Public-private: Landover with FCC oversight
Broadcaster Cost Coverage	Federal	Landover / private sector-funded
Customer Premises Equipment	$2.2B	$2.0B

The context of ongoing and planned mid-band auctions — such as the current effort by the FCC to repurpose the upper C-Band (3.98–4.20 GHz) — further illustrates why the public would benefit from the Commission authorizing a public-private clearing partnership for TV spectrum. In the C-Band NPRM, the Commission explains that the goal is to "expand the ecosystem for next-generation wireless services" by freeing up a significant mid-band asset for flexible use.[8] At the

[8] *In the Matter of Upper C-band (3.98-4.2 GHz)*, 90 Fed. Reg. 56076 (Dec. 5, 2025).

same time, under recent legislative changes, the FCC's auction authority has been extended, and the agency is expected to consider competitive bidding for unassigned spectrum in other bands (e.g., the AWS-3 inventory) in the coming year. These multiple, overlapping mid-band initiatives — each requiring extensive coordination, transition plans, technical analyses, and stakeholder outreach — make it clear that the Commission is already facing a heavy spectrum-management workload. The Landover public-private partnership plan would complement the current FCC spectrum auctions and initiatives in mid and upper bands with a minimum 54 MHz of new low band spectrum brought to market over the next 24 – 36 months.

Given this environment, the comprehensive and privately financed clearing and repacking framework developed by Landover presents a compelling alternative to adding another large-scale, resource-intensive repurposing project to the FCC's docket.

By enacting this proposal, the Commission can efficiently achieve low-band spectrum expansion by leveraging a public-private partnership. With Landover managing the repurposing with only the required level of regulatory oversight, the result would be a net reduction in administrative burden for the Commission, but with a much larger monetary outcome for the U.S. Treasury. That makes the proposal not only technically and economically sound, but administratively prudent. Granting this request would enable the FCC to foster spectrum repurposing without diverting scarce agency resources from other high-priority mid and upper-band auctions now underway.

VI. CONCLUSION

Repurposing Channels 28–36 through an FCC-authorized public-private model directly advances the nation's wireless and communications policy objectives of speed and time to market while serving the public interest expediently and in this Presidential administration, furthering its stated goal of gathering spectrum to drive 5G and 6G global leadership. This initiative will

significantly expand 5G and 6G access nationwide by adding critically needed low-band capacity, while accelerating the availability of spectrum capable of supporting advanced broadband deployment necessary for anticipated expansion of AI and Machine-to-Machine use cases. At the same time, the approach preserves over-the-air broadcasting through ATSC 3.0 channel-sharing arrangements, ensuring uninterrupted viewer service and coexistence between next-generation wireless operations and legacy broadcast transmission. Additionally, this approach maximizes value by assembling a nationwide footprint that can be transacted in contiguous blocks creating higher valuations than smaller allocations at the Regional Economic Area level.

Importantly, the risk is borne entirely by Landover, the "Sponsor"; the U.S. Government does not incur any expense or reimbursement obligations, thereby creating fiscal benefit to the U.S. Treasury. The clearing and relocation framework is condensed and streamlined rather than auction-sequenced, resulting in an execution timeline that is materially shorter and far less operationally disruptive. Finally, Broadcasters will receive equitable compensation addressing their current financial debt obligations while maintaining their service footprint, allowing them to participate in a Mobile Broadband ecosystem without sacrificing market continuity, station value, or competitive positioning.

Landover stands ready to commence the public-private partnership relocation engineering and spectrum clearing upon Commission approval and respectfully requests prompt authorization consistent with the Administration's public-private partnership initiative.

Respectfully submitted,

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