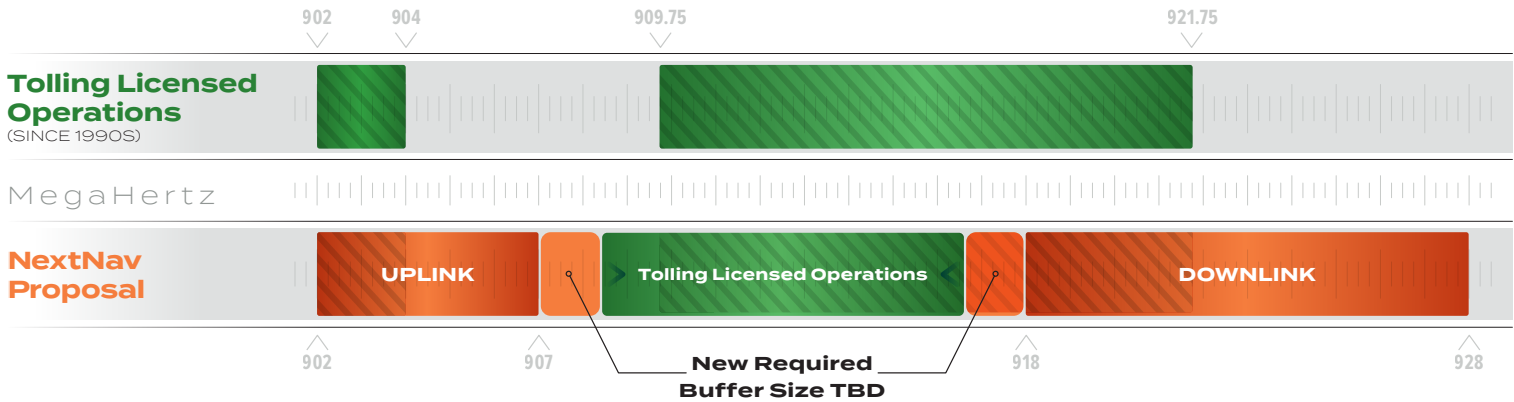


# Protect the 900 MHz Band

Maintain Safe, Efficient, and Economically Sustainable Operations of Transportation

## What is NextNav Proposing?

The FCC is being urged by NextNav, a PNT service company, to reallocate portions of the lower 900 MHz Smart Spectrum—despite the risk of disrupting electronic tolling and other critical smart technologies. If approved, this decision would hand NextNav a **competitive edge worth over \$2 billion at the expense of existing users.**



## Will the NextNav proposal hurt electronic tolling operations?

**0.05%**  
Maximum Allowable  
Error Rate

YES. Electronic tolling needs uninterrupted radio signals to ensure higher than 99% accuracy. Some jurisdictions limit the **allowable error rate to 0.05%** of total transactions.



NextNav's proposal would **substantially interfere** with electronic tolling operations for bridges, tunnels, and toll roads by shifting and compressing critical bandwidth by more than 20%.

## What Are the Economic Impacts?

**>\$23.0B**  
Produced Annually  
for State budgets

Tolling operations generate **over \$23 billion annually**. Even a slight drop in system accuracy—just a few percentage points—could result in losses of hundreds of millions of dollars each year.

**>\$2.4B**  
Replacement  
Equipment Costs

Retuning and replacing tolling equipment would cost at least **\$2.4 Billion**.

## Experts on gps back-up agree—government should not pick a single “winner.” The NextNav approach is not the answer.



“[G]ranting the NextNav petition is costly in terms of spectrum, not necessary to achieve this goal and likely would not even deliver a real-world improvement in the country’s PNT capabilities.”

—Resilient Navigation and Timing Foundation<sup>1</sup>



“The Federal Government should encourage adoption of multiple PNT sources, thus expanding the availability of PNT services based on market drivers... Federal actions should focus on facilitating the availability and adoption of PNT sources in the open market.”

—Cybersecurity and Infrastructure Security Agency  
U.S. Department of Homeland Security<sup>2</sup>



“The United States and other countries face a serious PNT resilience issue. True resilience requires the widest possible diversity, meaning that a singular sole-source technology will not only fail to meet the need in terms of reliability and performance but also be unable to evolve the optimal attack prevention and threat response capabilities.”

—Open PNT Alliance<sup>3</sup>

# NEXTNAV'S CLAIMS DON'T HOLD UP.

## Let the FCC know they should deny its petition.

### NextNav Claims



"IBTTA members use their spectrum resources parsimoniously." <sup>4</sup>

### REALITY



#### CRITICAL SPECTRUM ACCESS

NextNav oversimplifies and mischaracterizes how electronic tolling works.

Safe and reliable operations require access to all three spectrum segments for interoperability. NextNav misrepresents this need by assuming regional protocols operate in isolation.

Buffer spaces between the three segments prevent harmful interference.



"NextNav's Proposal Would Not Negatively Impact Transportation Infrastructure" <sup>5</sup>



#### INFRASTRUCTURE FUNDING AT RISK

States stand to lose hundreds of millions of dollars of infrastructure funding annually due to signal interference.



"... provides a pathway to NT service at no cost to taxpayers" <sup>6</sup>



#### UNFAIR MARKET ADVANTAGE

NextNav is asking for spectrum valued at over \$2 billion—a massive indirect subsidy.



... will "ensure incumbent operations are appropriately protected" <sup>7</sup>



#### UNPROVEN OR COSTLY ALTERNATIVES

NextNav concedes that tolling operations would have to move to other parts of the spectrum or pursue unspecified "other options." <sup>8</sup>



"... shared details with IBTTA and tolling community" <sup>9</sup>



#### LACK OF TRANSPARENCY

NextNav has not provided details of its planned operations to the toll industry, despite repeated requests.

References for NextNav statements available at [ibttta.org/ProtectSmartSpectrum](https://ibttta.org/ProtectSmartSpectrum)

### ABOUT IBTTA

IBTTA is the worldwide alliance of toll facility operators and associated industries that provides a forum for sharing knowledge and ideas to promote and enhance user financed transportation.