

# Wireless Roundup (January 2026)

December 31, 2025

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## Practice Areas

Telecom, Media & Technology  
Wireless

### Key Wireless Deadlines

**“Delete, Delete, Delete” Deadline to Oppose Coming Soon:** As a part of the Delete, Delete, Delete proceeding, the Federal Communications Commission (FCC or Commission) approved a Direct Final Rule in October that removes certain “outdated” and “unnecessary” wireless rules in parts 1, 13, 17, 20, 22, 24, 26, 27, 30, 54, 74, 80, 87, 88, 90, 95, 96, 97, and 101 of the Commission’s rules. Comments are due **January 2, 2026**. If no “significant adverse comments” are received, the identified rules will be removed **February 10, 2026**.

### **Comments Due on Equipment Authorization/Covered List FNPRM:**

On October 29, the Commission released a Further Notice of Proposed Rulemaking (FNPRM) as part of its ongoing efforts to implement the Secure Networks Act passed in March 2020. The FNPRM seeks comment on what components, if installed in a device, could lead to the same unacceptable risk as covered equipment, as well as the definition of “critical infrastructure” as used in the Covered List, among other things. It also asks for comment generally on the FCC’s marketing and importation rules, which could have effects well beyond the FCC’s Covered List. Comments are due **January 5, 2026**. Reply comments are due **February 2, 2026**.

**Comments and Petitions Due for SpaceX Application for New 15,000-Satellite NGSO System:** The Commission announced via Public Notice (PN) deadlines for comment on SpaceX's September 19 application to launch a new 15,000-satellite non-geostationary orbit (NGSO) system that would provide supplemental coverage from space (SCS) and operate in the mobile-satellite service (MSS). Comments and petitions are due **January 5, 2026**. Responses to Comments and Oppositions to Petitions are due **January 15, 2026**. Replies to Responses and Oppositions are due **January 22, 2026**.

**Nominations Due for WAC-27 Committee:** On December 11, the FCC issued a PN formally renewing the charter of the World Radiocommunication Conference Advisory Committee (WAC-27) in preparation for the 2027 World Radiocommunication Conference. Applications and nominations to serve on the Committee are due **January 9, 2026**.

**Commission Seeks Comment on Proposals to Accelerate Buildout of Wireless Infrastructure:** At its September 30 Open Meeting, the FCC adopted an NPRM that proposes to reduce regulatory burdens faced by wireless infrastructure builders at the state and local level. The Commission seeks suggestions on what additional measures the FCC can take to preempt state and local regulations that unlawfully interfere with the deployment of wireless networks. The NPRM also calls for suggestions on a potential expedited resolution process for permitting disputes. Reply Comments are due **January 15, 2025**.

**FCC Seeks Comment on Enabling More Intensive Use of 24+ GHz Bands Shared between UMFUS and FSS:** On October 28, the FCC adopted a NPRM that proposes comprehensive reforms to siting rules for earth stations in the Upper Microwave Flexible Use Service (UMFUS) bands. The proposal also calls for input on how the Commission can encourage more intensive use of the UMFUS bands, which are shared between terrestrial and Fixed Satellite Service (FSS) operators. Comments are due **January 20, 2026**. Reply Comments are due **February 18, 2026**.

**Commission Proposes Rules for Upper C-Band Spectrum Auction:** At its November 20 Open Meeting, the Commission adopted an NPRM to reconfigure and auction up to 180 megahertz of Upper C-band spectrum (between 3.98 and 4.2 GHz) for terrestrial wireless services. The proposed auction fulfills a statutory mandate in the "One Big Beautiful Bill Act" to free up at least 100 megahertz of Upper C-band spectrum by July 2027. The NPRM proposes bidding procedures and licensing, operating, and technical rules that draw heavily from the Lower C-band auction conducted from 2020 to 2021. Comments are due **January 20, 2026**. Reply Comments are due **February 18, 2026**.

**FCC Proposes to Overhaul and Modernize Part 25 Satellite Rules with New Part 100 Replacement:** On October 28, the FCC adopted an NPRM that proposes replacing existing satellite communications rules in part 25 of the Commission's rules with an entirely new part 100. The proposal would consolidate and reorganize existing rules, delete unnecessary or outdated ones, and introduce new frameworks meant to streamline the licensing processes for satellites and earth stations. Comments are due **January 20, 2026**. Reply Comments are due **February 18, 2026**.

**Commission Seeks Updated Comment on Making Additional Frequency Bands Eligible for Use by NGSO Satellites with ESIMs:** In a December 10 PN, the FCC invited new comments on whether to permit NGSO satellites systems to communicate with Earth Stations in Motion (ESIMs) in the 28.35–28.6 GHz band. The call for a refreshed record comes more than five years after the Commission first proposed similar changes in a 2020 FNPRM. Comments are due **January 21, 2026**. Reply Comments are due **February 5, 2026**.

## Upcoming Meetings and Events

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- **FCC Open Meeting:** The next FCC Open Meeting is scheduled for **January 29, 2026**. Meeting details can be found [here](#). The tentative agenda will be posted approximately three weeks prior to the meeting.
- **ISPAB Open Meeting:** The Information Security and Privacy Advisory Board (ISPAB) will hold an open meeting on **January 21-22, 2026** at the National Institute of Standards and Technology (NIST) National Cyber Security Center of Excellence. Meeting details can be found [here](#).
- **FTC Workshop:** On **January 27, 2026**, the Federal Trade Commission (FTC) will host a workshop titled “Moving Forward: Protecting Workers from Anticompetitive Noncompete Agreements.” More information can be found [here](#).
- **FTC Workshop:** On **January 28, 2026**, the FTC will host a workshop to discuss issues related to age verification and estimation technologies. More information can be found [here](#).

## Cyber Corner

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- **NIST Finalizes Three IoT Publications:** On **November 25, 2025**, NIST released final versions of three publications:
  - SP 1800-36: *Trusted Internet of Things (IoT) Device Network Layer Onboarding and Lifecycle Management: Enhancing Internet Protocol-Based IoT Device and Network Security*. NIST had released a draft for public comment in May 2024.
  - CSWP 42: *Towards Automating IoT Security Implementing Trusted Network Layer Onboarding*. NIST had released a draft for public comment in April 2025.
  - NISTIR 8350: *Foundational Concepts in Trusted IoT Device Network-Layer Onboarding*. This report was not released for public comment prior to publication. NIST obtained stakeholder feedback through industry engagement.
- **CISA and Partner Agencies Release Guidance on AI in Operational Technology:** On **December 3, 2025**, the Cybersecurity and Infrastructure Security Agency (CISA), the National Security Agency (NSA), the Federal Bureau of Investigation (FBI), and international partners released *Principles for the Secure Integration of Artificial Intelligence in Operational Technology*, which outlines four principles:

1. Understand artificial intelligence (AI) risks, secure development, and the importance of educating personnel;
  2. Consider AI use in operational technology (OT) for specific business cases, manage data security risks, the role of vendors, and integration challenges;
  3. Establish AI governance and assurance frameworks; and
  4. Oversight and “failsafe” practices.
- **SUSHI@NIST Workshop:** NIST will host its Sustainable Hardware Security @ NIST workshop titled “Rolling Next-Generation Secure Hardware into Standards” on **January 28, 2026**. More information can be found [here](#).

## **Other Wireless Developments**

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**Commission Releases Details and Deadlines for Upcoming Auction of AWS-3 Licenses:** On **December 18**, the FCC issued a PN outlining procedures, timelines, minimum opening bids, and required upfront payments for upcoming Auction 113 in the AWS-3 bands. The Commission will seek competitive bids for 200 Advanced Wireless Services licenses for spectrum specifically in the 1695–1710 MHz, 1755–1780 MHz, and 2155–2180 MHz bands. The auction will be the Commission’s first since its authority to use competitive bidding lapsed in 2023 (and was restored this past year). Bidding is scheduled to commence on **June 2, 2026**.

**FCC Adds All Foreign-Produced UAS and UAS Critical Components to Covered List:** In a surprise **December 22** PN, the Commission announced the addition of all uncrewed aircraft systems (UAS) and UAS “critical components” that are “produced in a foreign country” to the FCC’s Covered List. FCC rules generally prohibit covered equipment from receiving new FCC approvals under the agency’s radiofrequency equipment authorization program. Exceptions will be permitted if the Department of War or Department of Homeland Security makes a specific determination to the FCC that a given UAS or UAS critical component does not pose an unacceptable risk to national security; the form such specific determinations may take is not yet clear. In addition, pursuant to the Fiscal Year 2025 National Defense Authorization Act (NDAA), the FCC added all communications and video surveillance equipment produced by DJI and Autel (and partners, affiliates, JVs, and licensees of those entities) to the list. Sales of previously authorized UAS and UAS critical components are not affected, barring further FCC action. More details are available in this Wiley client alert.

**NDAA Passes Without Including a Defense Spectrum Veto Provision:** On **December 18**, President Trump signed into law the NDAA for Fiscal Year 2026. Missing from the enacted version was earlier Senate-approved text that would have provided the Secretary of War and Chairman of the Joint Chiefs of Staff with authority (until 2034) to prohibit modifications to defense systems operating in the 3.1–3.45 and 7.4–8.4 GHz bands.

**FCC Sets Compliance Deadline for Multilingual Wireless Emergency Alerts:** In a **December 18** PN, the FCC set **June 12, 2028** as the deadline for commercial mobile service providers that issue Wireless Emergency Alerts (WEA) to provide multilingual templates for alert originators to use during emergencies. Providers are required to develop templates in English, American Sign Language, and the next 13 most commonly spoken

languages in the United States. Details on the requirements may be found in the January 2025 Report and Order.

**Trump Administration Refocuses on Space in New EO:** On **December 18**, President Trump issued an Executive Order (EO), "Ensuring American Space Superiority," that seeks to establish "a space policy that will extend the reach of human discovery, secure the Nation's vital economic and security interests, unleash commercial development, and lay the foundation for a new space age." Among other things, the EO directs the Secretary of Commerce to coordinate spectrum leadership efforts, including by "considering opportunities for reapportioning and sharing spectrum." Within 120 days of the EO's release (**April 17, 2026**) the Secretary of Commerce must complete a spectrum leadership review. More details are available in this Wiley client alert.

**White House Issues EO on 6G Development:** On **December 19**, President Trump signed an EO, "Winning the 6G Race," that seeks to position the United States as the leader in 6G development. The EO directs the National Telecommunications and Information Administration (NTIA) to immediately begin the process of (a) identifying the 7.125–7.4 GHz band for reallocation, and (b) commencing studies to explore reallocation in the 2.69–2.9 GHz and 4.4–4.94 GHz bands. The EO also requires NTIA to immediately commence studies exploring how to relocate federal incumbents from the 7.125–7.4 GHz band and submit the results to the President within 12 months (by **December 19, 2026**). It tasks the State Department to advance 6G diplomatic engagement efforts in collaboration with NEC, OSTP, NTIA, and the FCC – including by building a coalition to support the U.S. position on WRC-27 Agenda Item 1.7, which will consider IMT use in the 4.4–4.8 GHz and 7.125–8.4 GHz bands.

**FCC Warns 3.45 GHz License Holders of "Significant" Consequences for Non-Compliance with 2026 Buildout Milestones:** On **December 19**, the Wireless Telecommunications Bureau (Bureau) sent letters to seven 3.45 GHz license holders reminding them of their "obligation under federal law to comply with buildout milestones" scheduled for 2026. The Bureau wrote that it "does not intend to excuse non-compliance" and warns of "significant regulatory consequences" for any failure to comply with the benchmarks. The letters emphasized that "erroneously predicted economic factors" would not be considered valid reasons for the Bureau to extend construction deadlines.

## **Recent Wiley Client Alerts, Blog Posts, and Podcasts**

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In Unexpected, First-of-Its-Kind Action, FCC Adds All Foreign-Produced Uncrewed Aircraft Systems and UAS Critical Components to Covered List

FCC Approves Changes to Rules Governing LPTV, TV Translator, and Class A Stations

FCC Imposes New Requirements on VoIP Service Providers with Direct Access to Number Blocks, Seeks Comment on Additional Measures

FCC First: National Security Cited for Removal from Robocall Mitigation Database

Wiley Consumer Protection Download (December 16, 2025)

FCC Delays (Again) Compliance Date for Expanded Foreign Government-Sponsored Programming Rules Until June 7, 2026