

Before the
DEPARTMENT OF COMMERCE
INDUSTRY AND SECURITY BUREAU
Washington, DC 20230

In the Matter of)	
)	
Notice of Request for Public Comments on)	
Section 232 National Security Investigation of)	Docket No. 250709-0122
Imports of Unmanned Aircraft Systems)	
)	
)	

COMMENTS OF THE
TELECOMMUNICATIONS INDUSTRY ASSOCIATION

I. Introduction

The Telecommunications Industry Association (“TIA”) appreciates the opportunity to comment regarding the Bureau of Industry and Security (“BIS”) Section 232 National Security Investigation of Imports of Unmanned Aircraft Systems (“UAS”). TIA represents over 400 trusted manufacturers and suppliers of America’s digital infrastructure. TIA members design, produce, market, and manage the information communications technology (“ICT”) equipment and services that connect Americans to high-speed broadband networks. We recognize that there are substantial national security equities in the UAS industry, and we support the use of trusted UAS vendors.

TIA members do not manufacture UAS; however, some supply the UAS industry. Additionally, telecommunications service providers use UAS for tasks such as tower management and maintenance. Using drones in this way allows service providers to enhance reliability while lowering costs and keeping workers safe. UAS can also enhance telecommunications technology by supporting the development of digital twins of network

infrastructure, the use of Artificial Intelligence to detect defects and deficiencies, and the enhancement of scale and dimensional accuracy in digital representations of tower assets.¹ As an ANSI-accredited Standards Developing Organization, TIA's TR-14 standards committee is currently involved in the development of tower-related standards that will enhance these use cases.

II. Growth of the UAS Industry

The U.S. unmanned aircraft systems industry is rapidly expanding, offering significant commercial and public safety benefits. For example, UAS technologies are enabling a wide range of commercial applications, including precision agriculture, port operations, delivery of goods, network and roadway infrastructure inspection and maintenance, traffic management, land observation, and much more.² UAS operations can also serve the public interest by making necessary medical deliveries (e.g., medicines and vaccines) to remote and rural areas, and aiding first responders in emergency response operations.³ Given the significant potential infrastructure, agricultural, health and public safety benefits, among others, we expect the low-altitude drone ecosystem to expand significantly over the next several years.

III. Supply Chain Considerations

Despite the many beneficial applications, the American UAS industry remains in the earlier phases, as U.S. companies work to develop a domestic supply chain and secure greater market share amid intense foreign competition. Therefore, any future action on the imports of

¹ Sam McGuire & Robert McCoy, Drones in Telecom: Tower Operations to Benefit from Standardizing Emerging Tech, *TIA Online* (2021), <https://tiaonline.org/drone-use-in-telecom/>

² See e.g., GSMA Intelligence, Mobile Operators Look to the Skies With Connected UAV Opportunity (Sept. 2022), available at: <https://data.gsmaintelligence.com/research/research/research-2022/mobile-operators-look-to-the-skies-with-connected-uav-opportunity>.

³ See *id.*

UAS and their parts and components should avoid disrupting the competitiveness and growth of the domestic UAS industry while mitigating risks to national security. Specifically, any action should reflect the realities of global supply chains, the complexity of transitioning sourcing strategies, and the importance of sustaining domestic industry growth. It is important that any action taken balances these considerations in a way that strengthens national security without stifling domestic innovation. Actions that result in closed foreign markets, retaliatory measures, or decreased demand for U.S. products could pose serious challenges to the still-fragile domestic UAS industry. The Administration should therefore take a measured, strategic approach, carefully engaging in significant and meaningful consultation with industry leaders and stakeholders before taking any action that could hinder the growth of the domestic UAS industry.

IV. Conclusion

TIA appreciates the opportunity to provide comments regarding the BIS investigation into national security concerns related to imports of unmanned aircraft systems. As we have discussed, these systems play a key role in many sectors of the economy – including in telecommunications infrastructure – and we hope that any actions taken by BIS take into account the realities of global supply chains and the complexity of transitioning sourcing strategies.

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