SUMMIT RIDGE GROUP

UNOFFICIAL GUIDE FOR THE

UPPER C-BAND TRANSITION PROGRAM: CORE BRIEF

A short companion to Summit Ridge Group's full guide, for Selection Committee members and other readers deciding where to start

J. Armand Musey, CFA, President | Fan Jia, PMP, Director
Daniel-John Perez, PMP, Director | John Tardio, ASA, Director | Welton Jones IV, Associate
August 16, 2026 | Version 1.1

IMPORTANT DISCLOSURES. This document is not endorsed by the FCC, the FAA, or any other government agency, and it is not legal, accounting, or investment advice. The rules it describes are not yet in effect: most take effect on September 29, 2026, several await Office of Management and Budget approval, and the Cost Catalog, lump sum amounts, and rebate categories and amounts will all be set by later public notices. Summit Ridge Group, LLC ("Summit Ridge" or "SRG") filed comments and ex parte letters in this proceeding, served as the Commission-confirmed 3.45 GHz Relocation Payment Clearinghouse, may seek the Clearinghouse or another administrative role in this program, and advises claimants in FCC reimbursement programs. Readers should weigh our perspective accordingly. The recommendations here are intended to improve program outcomes for all parties and are framed as measurable criteria that can be applied to any candidate or administrator, including Summit Ridge. This brief takes no position on the levels of lump sum amounts, the rebate categories or amounts, or the timing of incentive payments. The full guide states each point with complete citations; this brief compresses it to the essentials.

1. What the Order Adopted, and When It Bites

FCC 26-46 (the "Order") repurposes 160 megahertz at 3.98–4.14 GHz for terrestrial wireless use, sets a 20-megahertz guard band, and repacks Fixed Satellite Service ("FSS") into 4.16–4.2 GHz or moves it to the Ku-band.[1] Wireless service may begin on December 31, 2030, in markets covering roughly 70% of the U.S. population, and on July 1, 2031, in the rest of the contiguous United States. Auction bidding is expected to close by July 2027. The compliance deadlines are four years out. However, nearly every election, price schedule, and eligibility decision that determines who pays, and what they pay, will be set between October 2026 and mid-2027, leaving a tight schedule. The near-term calendar is listed in Figure 1 below.

Figure 1: The Five Dates That Set the Program's Terms

Date	What Happens
September 29, 2026	Most rules take effect, and the nine-member Clearinghouse Selection Committee convenes. Its selection criteria are due 30 days after its first meeting and are published without a comment cycle.
October 6, 2026	The Wireless Telecommunications Bureau ("WTB") publishes draft radio altimeter rebate categories, amounts, and documentation requirements for comment. Roughly 38,000 aviation claims are priced in this proceeding, which is not expected to be reopened.
November 5, 2026	SES, Eutelsat, and Telesat file public Transition Plans, the baseline against which every later cost claim is measured.

[1] Upper C-band (3.98–4.2 GHz); Expanding Flexible Use of the 3.7 to 4.2 GHz Band, GN Docket Nos. 25-59 and 18-122, Report and Order, Order of Proposed Modification, and Order on Reconsideration, FCC 26-46 (rel. July 24, 2026) ("Upper C-band Order"). Unless otherwise noted, paragraph citations in this brief are to the Upper C-band Order. The full guide carries pinpoint citations for every figure repeated here.

Date	What Happens
December 15, 2026	The Selection Committee informs the Commission of its Clearinghouse choice, subject to public comment and WTB confirmation.
Expected by January 24, 2027	WTB finalizes the Cost Catalog and lump sum amounts. The notice opens a 60-day, irrevocable, per-site lump sum election window for incumbent earth stations.

Source: Summit Ridge Group, LLC analysis of FCC 26-46. The January 2027 date depends on public notices not issued as of this writing.

Almost nothing on that list reopens. The incumbent earth station list is frozen as of November 19, 2025. The Transition Plans are final as to critical elements after one amendment window. The lump sum election cannot be reversed. Parties that wait for the Clearinghouse to open and publish its claims-processing handbook will have missed the proceedings that set the program's prices.[2]

2. The Two Costs the Order Avoids

The headline numbers are set: an estimated $4–$5 billion in FSS clearing costs, $6.3 billion in incentive payments, and $3.83–$5.71 billion in altimeter rebates, all funded by winning bidders. It will be far more complex than the Lower C-band process. The largest unresolved economic risks lie elsewhere: the costs of proving a claim and of waiting to be paid.

The cost of claiming. The Order presumes a claimant's soft costs will not exceed 2% of its hard costs. Against the record of comparable programs, that allowance is thin. The FCC's Office of Inspector General reported in March 2026 that third-party project management fees alone accounted for 13% of the amounts actually reimbursed under the Rip & Replace program, or 15% measured against hard costs, more than seven times the room the presumption leaves for all soft costs combined.[3] The presumption is rebuttable, and it is least safe for claimants with nothing large to average against: small filter claims, where the cost of filing dominates the value claimed. Radio altimeter rebate claimants fall entirely outside the presumption, since the rebate is a fixed amount with no soft-cost allowance.

The cost of delay. In the Lower C-band transition, SES reported an average of 323 days to reimbursement as of September 2023, computed on fewer than 8% of its claims that had been processed at all.[4] The payers fared no better. Verizon reported that the Lower C-band clearinghouse's operating budget grew from $62.2 million to more than $114 million.[5] In Rip & Replace, participants put the processing pace in late 2023 at roughly $40 to $50 million per month against a nearly $5 billion program.[6] The pattern extends to programs that never ran short of money: broadcast repack reimbursement ran six years past the physical transition[7],

[2]Upper C-band Order ¶¶ 111, 154, 156–58, 163, 182–84.

[3]Federal Communications Commission, Office of Inspector General, FCC OIG Advisory Regarding Fraud Risks in FCC's "Rip & Replace" Program, Project No. 24-AUD-06-02, at 5 fig.2, 8 fig.3 (Mar. 2026). The ratio to hard costs is Summit Ridge arithmetic on the OIG's figures. The OIG presented these figures in a fraud-risk advisory rather than as a soft-cost benchmark.

[4]Letter from Brian D. Weimer, Sheppard, Mullin, Richter & Hampton LLP, Counsel to SES Americom, Inc., to Marlene H. Dortch, Secretary, FCC, GN Docket No. 18-122, at 1–2 (filed Sept. 27, 2023) (metrics stated as of September 15, 2023).

[5]Comments of Verizon, GN Docket No. 25-59, at 16–17 (filed Jan. 20, 2026).

[6]Letter from Angela Simpson, Senior Vice President and General Counsel, Competitive Carriers Association, to Marlene H. Dortch, Secretary, FCC, WC Docket No. 18-89, at 1 (filed Dec. 1, 2023).

[7]Occupational Safety and Health Administration, FCC Broadcast Repack, https://www.osha.gov/communication-towers/fcc-repack (last visited Aug. 15, 2026) (39-month post-auction transition period commencing April 13, 2017,

and the 800 MHz rebanding took about 17 years against a 36-month schedule. Of the Lower C-band's roughly $3.4 billion in reimbursements, we estimate that a one-year payment lag alone eroded about $130 million in real value.[8] Delay is an unfunded cost borne first by claimants and ultimately, through financing claims and disputes, by the licensees who fund the program.

3. What the Order Fixed, and What It Left Open

The Order responds to that record with transparency requirements and financial controls. The adopted rules fix what any Clearinghouse must show. The items left open are those where the Selection Committee still has influence, as shown in Figure 2 below.

Figure 2: Adopted Controls Versus Open Variables

Now Written Into the Rules	Left to the Clearinghouse's Own Procedures
Internal controls and GAO Green Book procedures, fraud and improper-payment safeguards, and annual independent audits.	No deadline governs the Clearinghouse's review of a claim. Every binding clock in the Order turns on an event the Clearinghouse controls.
Quarterly public reports, including the pendency of claims, and stakeholder briefings at six-month intervals.	No escalation path exists for a stalled claim. WTB holds delegated authority to set deadlines later; nothing requires it to act.
A claims-processing handbook stating target timelines, due within six months of confirmation.	Documentation proportionality: batching, sampling, cost averaging, and certification are permitted, and none is required.
Payment within 30 days of invoice, objections decided within 30 days, and objection rights that expressly reach the Clearinghouse's own costs.	Compensation remains hourly, with no performance metrics, so the selection criteria are the remaining lever on incentives.

Source: Summit Ridge Group, LLC analysis of FCC 26-46 ¶¶ 140–52, 156–60 and 47 C.F.R. §§ 27.1416–.1421 (as adopted).

4. What Good Claims Administration Looks Like, and How to Test for It

Across the Lower C-band, 3.45 GHz, Rip & Replace, and repack records, good claims administration shows five observable attributes: predictable cycle times, documentation proportionate to the claim, transparent fund status, separation of the entity that decides a claim from the entity that holds the money, and public metrics detailed enough to verify the first four.[9] Each can be stated as a selection criterion and tested against evidence rather than representations. The third and fourth of those attributes are taken up in the paragraph that follows. The six measures below address the rest:

1) Cycle time for complete claims, reported by review stage rather than in aggregate. 2) A documentation proportionality policy stated in the bid: which categories are sampled, batched, or accepted on certification, and at what dollar thresholds. 3) Claim-error rates measured against post-audit review, since speed alone is the wrong target. 4) Dispute throughput and the age of the oldest pending claim. 5) Evidence of an actual close-out: a completed program, its final cost against the budget projected at the outset, and what the independent audit found.

---

placing completion of the physical repack in mid-2020); Federal Communications Commission, FCC Returns $881 Million in Unused TV Broadcaster Relocation Funds (Aug. 6, 2026), https://www.fcc.gov/document/fcc-returns-881-million-unused-tv-broadcaster-relocation-funds (returning the TV Broadcaster Relocation Fund's unused balances).

[8] Summit Ridge arithmetic, as presented in Letter from J. Armand Musey, President, Summit Ridge Group, LLC, to Marlene H. Dortch, Secretary, FCC, GN Docket No. 25-59, at 5–6 (filed June 2, 2026). Claimants' actual cost of capital exceeds the inflation rate, so the figure understates the economic cost.

[9] Upper C-band Order ¶¶ 140–52, 156–60; 47 C.F.R. §§ 27.1416–.1421 (as adopted).

6) How much of the mechanical work the candidate performs systematically rather than by hand, with evidence, because roughly 38,000 rebate claims will be decided on eligibility and completion rather than cost reasonableness.

Candidates should be asked how program funds will be held. In the 3.45 GHz program, which Summit Ridge administered and closed on budget with an audited final report, funds sat in dedicated custodian accounts at a regulated financial institution, separate from the administrator's operating funds, and were released only against approved determinations.[10] The full guide's Appendix G presents these measures as questions a committee could ask any candidate, including Summit Ridge, along with a one-page disclosure matrix for collecting answers in a comparable format.

5. The Calendar by Stakeholder Group

Each stakeholder group faces a near-term date that is effectively fixed, well before the 2030 and 2031 compliance deadlines. Figure 3 below lists those dates in order, along with the comment cycle in which each group's participation carries the most weight.

Figure 3: Nearest Fixed Date and Highest-Leverage Opportunity, by Group

Group	Nearest Fixed Date	Highest-Leverage Comment Opportunity
All parties	Selection Committee convenes September 29, 2026	Views to the Selection Committee before it writes its criteria
Airlines (first FAA deadline)	October 6, 2026	WTB's draft rebate proposals: categories, amounts, and documentation
Aircraft owners (second FAA deadline)	October 6, 2026	The same cycle: spares, categories, and counting conventions
Eligible space station operators	November 5, 2026	The Cost Catalog cycle: the treatment of financing and internal labor
Incumbent earth station operators	Cost Catalog notice plus 60 days, expected late Q1 2027	The draft Cost Catalog cycle, which also sets the lump sum categories and amounts
Prospective bidders and licensees	Bidding expected to close by July 2027	The Cost Catalog and rebate cycles, which set the costs that licensees underwrite

Source: Summit Ridge Group, LLC analysis of FCC 26-46. Comment-cycle timing that depends on future public notices is described as expected.

6. Where to Go From Here

The full guide sets out each of these points with paragraph-level citations, preparation steps by stakeholder group, claim-readiness checklists, and sample comment language. Summit Ridge intends to update it as the Cost Catalog, lump sum amounts, rebate schedule, Clearinghouse selection, and claims-processing handbook are published. Do not hesitate to reach out to us with any questions.

[10] 3.45 GHz Relocation Payment Clearinghouse, Final Report and Audited Statement of Funds Expended, WT Docket No. 19-348 (filed Mar. 10, 2025).