

**Senate Committee on Commerce, Science, and Transportation’s Subcommittee on
Telecommunications and Media’s Hearing on “U.S. Leadership at the World
Radiocommunication Conference 2027: Strategy and Challenges Ahead of Shanghai”**

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Testimony of Grace Koh, Vice President of Government Relations at Ciena and former Ambassador
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(as prepared for delivery)

Chairman, Ranking Member, and Members of the Subcommittee, thank you for the opportunity to testify on U.S. leadership at the World Radiocommunication Conference 2027.

My name is Grace Koh. I am Vice President of Government Relations at Ciena, and I had the privilege of serving as the U.S. Ambassador and Head of Delegation to WRC-19. I am here in my personal capacity; my employer has no significant stake in the outcomes of WRC-27.

I will make two points: why consensus is essential at a WRC—and why it is so hard to achieve—and why we must prepare early given the added risks of holding WRC-27 in Shanghai.

The Value—and Difficulty—of Consensus

The World Radiocommunication Conference is among the most technically complex treaty negotiations in the world. Nearly 200 administrations participate, and the outcomes set global rules for spectrum use and satellite operations.

Those outcomes are almost always reached by consensus. A vote is widely viewed as a failure—not just as a matter of tradition, but because the system cannot work without broad buy-in.

Spectrum rules only matter if countries implement them. Signals cross borders and satellites operate globally. If rules were adopted by narrow votes, dissenting countries would have little incentive to comply—driving more interference and less predictability for everyone.

Consensus produces durable rules—but it is hard, and the work starts years before the conference opens.

In the United States, WRC preparation pulls together federal agencies, engineers, and private-sector stakeholders with competing priorities. Carriers want capacity for mobile networks. Satellite operators want globally harmonized rules for new systems. Federal agencies must protect missions tied to national security, aviation safety, and weather.

Reconciling those interests takes time—technical studies, policy tradeoffs, and hard negotiation. Parties test limits and hold positions. Progress requires persistence, credible analysis, and practical compromises. It also requires making hard calls.

But this work strengthens the U.S. position. By the time we arrive with a proposal, the toughest objections have been surfaced and addressed. We show up with a position that is technically credible and resilient at the negotiating table.

At the conference, negotiators must turn those different proposals into workable global rules in four weeks.

That is why the final days can run late into the night. But consensus is usually reached because everyone understands the alternative: the possibility of no rules and more interference.

Preparing for WRC-27 in Shanghai

For WRC-27, the takeaway is simple: start early. Consensus takes sustained work with U.S. stakeholders and with other delegations. We cannot afford to delay.

Here's why. Shanghai adds real operational and political risk—including a host government whose interests may diverge sharply from ours.

We should assume devices and communications may be monitored. That raises cybersecurity risks for a delegation that depends on laptops, phones, and shared technical documents. We should also plan for constrained connectivity: common U.S. collaboration tools may not work reliably. Delegations may have limited access to remote technical support, so key experts must be on site to respond to late-breaking proposals. Export controls can further limit discussions, and state media may try to shape the narrative.

The response is preparation and discipline. Resolve sensitive policy issues earlier—*not* in Shanghai. Train the delegation early. Name the head of delegation early, staff the delegation to cover parallel sessions, and train the team throughout the cycle. Issue clear guidance on cybersecurity, communications, and export compliance. At the conference, enforce tight information-handling practices.

The State Department will also need to intensify engagement with ITU leadership to protect a transparent, rules-based conference—and plan now with like-minded partners for contingencies, including unexpected political disruptions.

Early decisions also let U.S. negotiators build support and shape regional positions before WRC-27. That requires full-strength leadership at both NTIA and the FCC. In WRC-19, NTIA did not have a confirmed Administrator. In WRC-23, the FCC's spectrum auction authority had lapsed. Thankfully, Congress has restored the FCC's auction authority and confirmed the NTIA Administrator. Going forward, both agencies should be expected to fully represent federal and private-sector equities.

The United States enters the WRC-27 cycle with major strengths: world-class technical expertise, a transparent preparation process, and strong government–industry collaboration.

If we start early and plan rigorously for the Shanghai environment, we will be well positioned to shape global spectrum policy in ways that advance innovation, growth, and national security.

Thank you, and I look forward to your questions.