

**STATEMENT OF
COMMISSIONER JESSICA ROSENWORCEL**

Re: *Incentive Auction of Upper Microwave Flexible-Use Service Licenses in the Upper 37 GHz, 39 GHz, and 47 GHz for Next-Generation Wireless Services*, AU Docket No. 19-59.

With this Public Notice, we move one step closer to an auction of up to 3,400 megahertz of spectrum across the 37, 39, and 47 GHz bands. This represents the largest swath of contiguous spectrum for 5G services yet. It's an impressive number.

But there's another number that deserves more attention than it is getting. And that's the amount of critical mid-band spectrum this agency has made available for 5G services. That number is zero.

The reality is that as we forge ahead the United States is increasingly alone in its mission to make millimeter wave the core of its domestic 5G approach. This means that we have internationally ceded leadership when it comes to mid-band spectrum. If you want evidence this is true, it's out in the open for all to see. You can start with South Korea, which last year wrapped up an auction of the 3.5 GHz band. You can move on to the United Kingdom, which held an auction last year of the 2.3 and 3.4 GHz bands. At roughly the same time Spain and Italy held auctions of the 3.6-3.8 GHz bands. Austria did the same with the 3.4-3.8 GHz band earlier this year. Similarly, Switzerland auctioned the 2.6 GHz and 3.5 GHz bands this year, as well as the 1.4 GHz band. Meanwhile, Germany and Japan are both auctioning mid-band spectrum this month. And China allocated 300 megahertz of mid-band spectrum for carriers last year. The United States? Again, when it comes to mid-band spectrum, we've made available zero.

This is a problem. If we continue our current path—prioritizing only millimeter wave—we may find ourselves without a global supply base as mid-band becomes the core of worldwide 5G service. This means less scale, higher costs, interoperability challenges, and less security as other nations' technologies proliferate. Moreover, recent commercial launches of 5G service in the United States are confirming what we already know—that commercializing the millimeter wave will not be easy, given its propagation challenges. The network densification these airwaves require is costly. If we want to serve everywhere in the country—and not create communities of 5G haves and 5G have-nots—we are going to need a healthy mix of airwaves that provide both coverage and capacity. That means we need mid-band spectrum. And it's especially important for rural America, where the challenging economics of service do not presently support the high cost of high-band infrastructure. This is a fact and no pronouncement from this agency or this Administration will make it otherwise.

So here's what we need to do. It's time for the United States and the Federal Communications Commission to flip its priorities and pivot to the mid-band. We can start by scheduling an auction of the 3.5 GHz band. We should continue our discussion and engage Congress regarding the 3.7-4.2 GHz band. Then we need to explore innovative opportunities for making more efficient use of the 2.5 GHz band. Finally, we need to continue to press our federal partners to work collaboratively with us to open more mid-band spectrum for new commercial use.

The truth is when it comes to mid-band spectrum we are not just behind, we are no longer even running in the same race as the rest of the world. The good news is that it's not too late to do something about it. So while we celebrate the auction of yet more high-band spectrum today, what we need to do next is prioritize bringing mid-band spectrum to market. And if we are successful, we can reclaim what we have lost and make real progress with the deployment of 5G service to every community, everywhere across the country.