



## TELECOM INFRA PROJECT

March 10, 2021

### BY ELECTRONIC FILING

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
45 L Street NE  
Washington, DC 20554

**Re: Ex Parte Presentation, *Promoting the Deployment of 5G Open Radio Access Networks*, GN Docket No. 21-63**

Dear Ms. Dortch:

On March 9, 2021, Attilio Zani, Executive Director of the Telecom Infra Project (“TIP”) and the undersigned met by teleconference with staff from the Wireless and International Bureaus and the Office of Engineering and Technology (see attachment) to discuss the above-captioned proceeding. TIP provided a general introduction to its activities, including its work on productization of open-architecture network solutions, as well as its project groups including OpenRAN, Open Optical & Packet Transport (“OOPT”) and Open Core, among others.<sup>1</sup>

As discussed during the meeting, TIP welcomes the Commission’s engagement on Open RAN issues and strongly supports adoption of the draft Notice of Inquiry (“NOI”). In addition, TIP supports and facilitates the broader trend toward disaggregated, standards-based, and interoperable interfaces for the entire infrastructure ecosystem – that is, not just radio access networks (“RANs”). While much attention has focused on RAN vendor diversity, an open and disaggregated approach *throughout* the network – including core and transport elements – will ultimately provide operators with the greatest choice and flexibility while promoting competition and innovation.

The Commission recently recognized the importance of non-RAN elements when the agency prioritized funding for core equipment replacement over RAN replacement in the Secure and Trust Communications Networks Reimbursement Program.<sup>2</sup> Meanwhile, the draft NOI would seek comment – in the RAN context – on the benefits of increased competition, network vendor diversity, affordability, and network safety. It also would seek comment on barriers to

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<sup>1</sup> Telecom Infra Project, *Project Groups*, <https://telecominfraproject.com/project-groups/#productg>

<sup>2</sup> Second Report and Order, *Protecting Against National Security Threats to the Communications Supply Chain Through FCC Programs*, [FCC 20-176](https://www.fcc.gov/record/2020/12/11), rel. Dec. 11, 2020, at ¶¶ 157, 162.

deployment, as well as potential Commission efforts to encourage new efforts and leverage existing efforts. Many of these topics, if not all, would be relevant to open and disaggregated architectures in non-RAN contexts as well.

Accordingly, **TIP recommends that the Commission broaden the scope of the draft NOI to encompass other open and disaggregated network elements, including Open Core and OOPT solutions.** While the current draft does contain a reference to “packet core,”<sup>3</sup> a clearer elucidation of scope may encourage non-RAN-focused commenters to participate. It would also likely help the Commission develop a fuller record as it considers next steps. We recommend the following changes:

- An additional (and brief, if necessary) Section III-F focused on non-RAN elements such as core and transport networks, with commenters invited to respond to questions asked in all previous parts of the Discussion section as applicable; and
- Appropriate modifications to the Introduction and Background sections to indicate that open and disaggregated non-RAN elements are also in scope.

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Pursuant to Section 1.1206 of the Commission’s rules, this letter is being filed in ECFS. Please do not hesitate to contact the undersigned with any questions.

Sincerely,

/s/ Dileep Srihari

Attilio Zani  
Executive Director  
TELECOM INFRA PROJECT  
401 Edgewater Pl Suite 600  
Wakefield, MA 01880

Dileep Srihari  
Senior Policy Counsel  
ACCESS PARTNERSHIP  
1730 Rhode Island Ave NW Suite 512  
Washington, DC 20036

Cc: FCC meeting attendees

Enc. List of participants

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<sup>3</sup> Draft NOI at ¶ 24.

### **List of Meeting Participants**

Attilio Zani                      Executive Director, Telecom Infra Project  
Dileep Srihari                    Senior Policy Counsel, Access Partnership

Paul Powell                      WTB  
Jaclyn Rosen                      WTB  
Catherine Schroeder          WTB  
Sean Spivey                      WTB  
Olga Madruga-Forti          IB  
Jim Schlichting                IB  
Dana Shaffer                    OET