



March 23, 2020

VIA ELECTRONIC FILING

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: ***Ex Parte Presentation, Unlicensed Use of the 6 GHz Band***, ET Docket No. 18-295; *Expanding Flexible Use in Mid-Band Spectrum Between 3.7 and 24 GHz*, GN Docket No. 17-183, *Facilitating Shared Use in the 3.1-3.55 GHz Band*, WT Docket No. 19-348

Dear Ms. Dortch:

CTIA commends the Commission for its recent actions to deliver 350 megahertz of much-needed mid-band spectrum this year through auctions of the 3.5 GHz and 3.7 GHz bands. As the Commission knows well, mid-band spectrum provides an ideal mix of coverage and capacity to advance 5G as a break-through enabler of innovation. Others do, too: mid-band spectrum is fast becoming the backbone band of our global rivals' 5G spectrum strategy. This year's auctions will help us keep competitive with where other nations are today, but they are quickly outpacing us.

A new report by Analysys Mason (attached) concludes that the United States is "far behind" the 13 other benchmark nations in terms of licensed mid-band spectrum currently available and that the five leading countries are on track to have over 300 megahertz more licensed mid-band spectrum than the U.S. will have by 2022.¹ Outside the United States, every mobile network operator in the benchmark countries—19 out of 19—that has launched 5G has used mid-band spectrum to do so. And other countries are moving rapidly to make further mid-band spectrum available. Significant findings in the latest Analysys Mason report include:

¹ Janette Stewart, Chris Nikerson, & Tamlyn Lewis, *5G Mid-Band Spectrum Global Update*, ANALYSYS MASON (Mar. 2020). This report updates a 2018 Analysys Mason report. See David Abecassis, Janette Stewart, Michael Kende, and Chris Nickerson, *Mid-Band Spectrum Global Update*, ANALYSYS MASON (Nov. 2018).



- **Other countries will have more than five times the amount of mid-band spectrum than the United States by the end of 2020**, with an average of 382 megahertz of licensed mid-band spectrum assigned in the benchmark countries, while the U.S. will have only 70 megahertz of assigned mid-band spectrum through the auction of CBRS spectrum.
- The average amount of licensed mid-band spectrum expected to be assigned by the end of 2020 in **Canada, China, Japan, South Korea, and the United Kingdom has increased 32 percent since the 2018 Analysys Mason report**, demonstrating that these countries continue to lean in on mid-band spectrum as the core of the next-generation networks.
- The average amount of licensed mid-band spectrum is projected to grow by 22 percent to **more than 660 megahertz in Canada, China, Japan, South Korea, and the United Kingdom from the end of 2020 to 2022**.
- Even with plans to assign 350 megahertz of licensed mid-band spectrum, the amount of mid-band spectrum available in **the United States will lag behind key countries by more than 300 megahertz by 2022**.²

Closing this licensed mid-band deficit will be a key element of America's 5G success. The U.S. spectrum pipeline needs more licensed mid-band spectrum beyond the 350 megahertz identified today. Currently, there are two candidate bands to address this deficit: 3.1-3.55 GHz and 5.925-7.125 GHz. It is incumbent upon the Administration and the Commission to take a holistic view of those proceedings and not view either opportunity in a vacuum.

The 6 GHz band offers the unique opportunity to enable new unlicensed and licensed services, and the Commission should not squander this chance to resolve the licensed mid-band spectrum deficit by giving away all 1,200 megahertz for unlicensed use prematurely.³ Given that the United States

² *Id.* at 1-2.

³ See, e.g., Doug Hyslop, *Cable, Google and Facebook's Numbers Don't Add Up*, CTIA (Mar. 12, 2020), <https://www.ctia.org/news/blog-cable-google-and-facebook-numbers-do-not-add-up>; Letter from CTIA to FCC, ET Docket No. 18-295 (filed Feb. 24, 2020).



is an outlier in devoting substantially more mid-band spectrum to unlicensed and shared use than other key countries,⁴ the Commission should move ahead with opening the lower portion of the band for unlicensed use, subject to an effective interference protection regime, while exploring the opportunity to repurpose the upper portion of the band for exclusive, flexible-use licensing. This approach would roughly double the amount of spectrum Wi-Fi is currently using and would be consistent with other countries around the world that are considering permitting unlicensed use in the 5925-6425 MHz band.⁵

CTIA also continues to encourage the Commission to work closely with the National Telecommunications and Information Administration to ensure that spectrum in the Lower 3 GHz band is made available for exclusive licensed commercial use under a 5G-friendly framework that does not foreclose terrestrial access or hinder the utility of the spectrum for 5G.⁶

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

Sincerely,

/s/ Scott K. Bergmann

Scott K. Bergmann

Senior Vice President, Regulatory Affairs

Attachment

⁴ See, e.g., David Abecassis, Janette Stewart, and Chris Nickerson, *International Comparison: Licensed, Unlicensed, and Shared Spectrum, 2017-2020*, ANALYSYS MASON (Jan. 2020) (demonstrating that the United States stands alone in its approach to the 6 GHz band).

⁵ See Kara Graves, *Global Consensus Is Against 6 GHz Giveaway*, CTIA (Mar. 20, 2020), <https://www.ctia.org/news/blog-global-consensus-is-against-6-ghz-giveaway>; Letter from CTIA to FCC, ET Docket No. 18-295, at 2-4 (filed Mar. 13, 2020).

⁶ See Comments of CTIA, WT Docket No. 19-348 (filed Feb. 21, 2020).