In the Matter of	)	
	)	
WIRELINE COMPETITION BUREAU SEEKS COMMENT	)	
ON EMERGENCY CONNECTIVITY FUND FOR	)	WC Docket No. 21-93
EDUCATIONAL CONNECTIONS AND DEVICES TO	)	
ADDRESS THE HOMEWORK GAP DURING THE PANDEMIC	)	
	)	

REPLY COMMENTS OF THE WIRELESS BROADBAND ALLIANCE

April 5, 2021

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I. INTRODUCTION AND SUMMARY

Wireless Broadband Alliance (WBA) is pleased to submit these reply comments in response to the Public Notice issued by the FCC seeking information on the plan to mitigate the impacts of schools and libraries shutting their doors and the transitioning to virtual learning, potentially impacting students and citizens.

Founded in 2003, the vision of the Wireless Broadband Alliance (WBA) is to drive seamless, interoperable service experiences via Wi-Fi within the global wireless ecosystem. WBA's mission is to enable collaboration between service providers, technology companies and organizations to achieve that vision. WBA undertakes programs and activities to address business and technical issues, as well as opportunities, for member companies. Building on our heritage of Next Generation Hotspot and carrier Wi-Fi and through recent initiatives like Open Roaming, [1] WBA is driving the adoption of Next Generation Wi-Fi services across the entire public Wi-Fi ecosystem, including IoT, Big Data, Converged Services, Smart Cities and 5G. WBA's membership is comprised of major operators and leading technology companies.[2]

In these reply comments, WBA highlights technical advances in Wi-Fi related with OpenRoaming solution that was announced by WBA and provide the building blocks to augment the availability and accessibility of Wi-Fi networks locally and globally. WBA stands ready to work with the Commission and existing stakeholders to participate in field trials of potential global Wi-Fi deployments that include OpenRoaming. Namely, WBA community agrees the key benefits from its adoption are: 1) Security, 2) Data Privacy, 3) Democratic Interoperability & Roaming and 4) Auto-login.

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[1] https://wballiance.com/openroaming/
[2] Complete list of WBA members: http://www.wballiance.com/join-us/current-members/

II. TECHNICAL ADVANCES WITH OPENROAMING PROVIDE THE BUILDING BLOCKS FOR END-TO-END WI-FI BASED AUGMENTATION OF NETWORK ACCESSBILITY

OpenRoaming, a technology for seamless Wi-Fi onboarding is built upon a set of standards and guidelines developed by the WBA and Wi-Fi Alliance and is now adopted as an industry wide initiative led by the WBA. OpenRoaming has seen tremendous growth in the past year and is expected to play a crucial role in delivering great mobile experiences and usher in a new era of mobile applications.

The move, in line with the WBA's history and leadership on Wi-Fi roaming services and interoperability, is designed to facilitate broad adoption of OpenRoaming in Wi-Fi networks by identity & service providers, and other technology partners across the Wi-Fi ecosystem.

OpenRoaming is a roaming federation service enabling an automatic and secure Wi-Fi experience globally. To do so, OpenRoaming brings together a federation of trusted identity providers, allowing users to join any network managed by a federation member. The network is able to automatically authenticate devices by using established identity providers, such as a service provider, device manufacturer, cloud ID, or even loyalty membership. It encompasses three key elements:

1. Cloud federation: creates a federation of networks and identity providers to enable automatic roaming and user onboarding on Wi-Fi. Based on WBA's Wireless Roaming Intermediary eXchange (WRIX) standards to scale and facilitate different business models under a harmonized framework.

2. Cyber Security: enables simple, secure and scalable Wi-Fi connections amongst different organizations that are part of WBA OpenRoaming. Allowing automatic

and secure roaming between millions of networks, nationally and globally with secured interconnection and encrypted communications.

3. Network automation: defines an automated roaming consortium codes framework (RCOI) to support policy provision on devices and networks. Organizations that manage a Wi-Fi CERTIFIED Passpoint®-enabled network may become part of the WBA OpenRoaming™ federation.

OpenRoaming has significant momentum and has been well received. Over 50 global organizations have pledged support for OpenRoaming and field trials are currently being conducted around the world, resulting in global deployments. Any public Wi-Fi in cities, municipalities and enterprises can deploy the technology in an agile manner, either leveraging existing business relationships or open-source models. That said, with respect to the Public Notice, a baseline standard approach would very much facilitate the access to the community and especially students to any readily available Wi-Fi infrastructure, leveraging common end user devices, such as mobile phones, tables and laptops.

The Commission should be encouraged by the progress that industry has made to date of its own initiative to pursue an aggressive program of incentivizing both technical and policy innovation through field trials, rulemaking and collaboration with Congress where necessary. The lesson to draw from the foregoing examples and solutions like OpenRoaming is that industry could innovate *even faster* with a conducive regulatory and risk environment that is voluntary, and that it should not allow the perfect to be the enemy of the good.

III. CONCLUSIONS

In summation, the FCC should be commended for inviting industry to reimagine the role of Wi-Fi in delivering baseline connectivity services to US persons as a result of the current pandemics situation. Technical advances in Wi-Fi networks – including but not limited to OpenRoaming – leads WBA to advocate for auto-login, security, data privacy, democratic interoperability and roaming. Therefore, WBA recommends OpenRoaming as one of the building blocks to augment the possibility of creating a truly holistic country wide coordinated deployment.

Finally, WBA stands ready to work with the Commission and existing stakeholders to participate in field trials of potential end-to-end Wi-Fi OpenRoaming solutions.

Respectfully submitted,

Wireless Broadband Alliance

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