May 2, 2019

Marlene H. Dortch, Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, D.C. 20554

Re: ***Expanding Flexible Use of the 3.7-4.2 GHz Band***
GN Docket No. 18-122

Dear Ms. Dortch:

The Innovation Defense Foundation is a nonprofit, nonpartisan research and issue-advocacy institution that advocates for "permissionless innovation," seeking to repeal, relax, or replace unnecessary regulations that stand in the way of innovation. Through a combination of research, advocacy, and regulatory filings, the IDF pushes back against risk-averse, regressive, and precautionary policies that both threaten America's innovators and limit our society's ability to cope with new and existing challenges. We write today to support the spectrum sharing proposal of the Broadband Access Coalition, which will promote innovation and broadband service to rural Americans that, today, cannot participate in the digital economy.

Today in the United States there are 287 million Internet users. The online world has changed how we live, prompting a burst of innovation that reaches every aspect of our lives. How we shop, how we keep in touch with friends and family, how we watch television and movies and how we work — all of these things have been changed by the Internet. And it is not just the simple things in life that the Internet has changed. With enhanced access to vital services such as telemedicine and online education, most Americans have access to services unimaginable just a decade ago.

But not every American enjoys these benefits. According to the FCC's 2018 broadband deployment report, 24 million Americans have little or no access to high-speed Internet. Broadband deployment in rural America lags the rest of the nation due to the prohibitive infrastructure costs of serving small and isolated communities. Fortunately, however, the FCC has a chance to correct this disparity by reconsidering the way spectrum is allocated and, if done properly, that change could open the door for companies to quickly ramp up service to these underserved communities.

One of the most innovative proposals in this proceeding is the Broadband Access Coalition's plan to allow fixed wireless service providers the opportunity to rapidly enter the market in these underserved regions, delivering quality, affordable high-speed Internet access to those previously

unable to obtain it. Importantly, the Coalition's proposal would ensure that those currently using the spectrum — fixed satellite service and other fixed services — would not be harmed by any potential interference from the new spectrum users. The FCC would coordinate between existing and new users to ensure everyone can coexist. Basically, the proposal would empower the FCC to arrange current users more efficiently while ensuring that no spectrum needlessly lies fallow when it could be put to use serving rural customers.

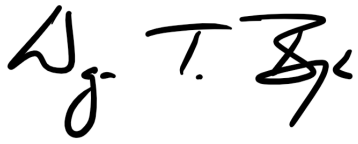
Fixed wireless service is a very localized form of Internet access ideally suited for serving rural communities. In fact, the average fixed wireless service provider has only about 1,200 customers. Fixed wireless Internet providers set up an Internet-connected base station and then wirelessly transmit Internet access to their local customers. It's easy to deploy and the capital costs of setting up a fixed wireless network is roughly one-sixth the cost of laying cable, making it truly affordable for most rural Americans.

While the digital divide has long been a concern of the FCC and federal government, solutions often focus on government programs and subsidies like the costly and inefficient universal service fund for telephone service. This approach is a burden on taxpayers and politically contentious, which means it often takes years to implement. Fixed wireless, on the other hand, is capable of being deployed the minute the light turns green.

Providing reliable high-speed broadband access to rural communities has significant economic benefits. Take, for instance, agriculture, which has always relied on evolutionary technology to thrive. Fixed wireless service can bring the high-speed Internet where the local telephone and cell companies won't go, enabling high-tech farming to increase crop yields and quality; robotics and drones for herd and crop management; and sensors to oversee soil conditions. Similarly, access to telemedicine and other essential online services can provide important quality-of-life improvements for rural communities, too.

Rearranging the C-band to utilize bandwidth more efficiently will attract innovators and entrepreneurs who are willing to make the necessary investments to bridge the broadband divide. The IDF is pleased to support the Broadband Access Coalition's proposal to allow fixed wireless broadband providers to share a portion of the C-band with earth stations.

Respectfully submitted,



Wayne T. Brough, President