

June 2, 2020

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

RE: Unlicensed White Space Device Operations in the Television Band, ET Docket No. 20-36

As a diverse coalition of small businesses that innovate throughout the technology spectrum, we write to express our support for the Federal Communications Commission's work to close the digital divide. It is critical to provide Americans across the country with broadband access, and we particularly commend the Commission's recent steps to enable the use of television white spaces (TVWS) to bring broadband connectivity for underserved Americans. Robust wireless broadband connectivity is necessary to reinforce countless new consumer and enterprise services that we develop, which in turn empower increased societal opportunity and participation in and increasingly digital world.

Amidst the current COVID-19 public health emergency, it is increasingly evident that while the United States made progress to provide broadband connectivity to many Americans, it still has a long way to go. With stay-at-home orders in place across the country, reliable broadband connectivity is now essential for children to keep up with their schoolwork, for doctors to treat and monitor their patients, to do our jobs from home, and to connect and check in on our loved ones. As a result, the Commission should look to expedite proceedings such as the TVWS Notice of Proposed Rulemaking (NPRM)¹ that will provide updated rules and expanded utilization of TVWS, which in turn will increase and improve broadband access to rural communities.

The Commission's proposals to allow for wider broadband coverage through increased antenna height and power with proper interference safeguards; create geofenced mobile platforms; and implement rules for the deployment of narrowband internet of things (IoT) represent necessary steps to enable robust last-mile connectivity, as well as the development of new network edge innovations. The changes proposed by the Commission will, once finalized, enable additional efforts to address the ongoing COVID-19 public health emergency and further provide a foundation for innovation in a post-COVID world.

We applaud the Commission's work to maximize efficiency in the use of television broadcast spectrum and urge it to advance much-needed TVWS rules as soon as practicable, and by no later than the end of 2020. Such TVWS rules are an important next step to ensuring that all Americans have access to every opportunity a broadband connection provides regardless of geographic location.

¹ Unlicensed White Space Device Operations in the Television Bands, ET Docket No. 20-17, Notice of Proposed Rulemaking (rel. March 2, 2020) available at: <https://www.federalregister.gov/documents/2020/04/03/2020-06569/unlicensed-white-space-device-operations-in-the-television-bands>.

Respectfully,

/n software

1564b

BadVR

Camelback Ventures

CData Software

ChAPPerone

Colorado Technology Consultants

ComputerWays

DevScale

Dogtown Media

ForAllAbilities

Fresco Capital

Jessie

Kaia Health

Koda Learning

Medical Society of Northern Virginia (MSVNA)

Mend

Quantified Ag

Rimidi

SentryOne

SouthernDNA

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TEEM Marketing

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