



June 2, 2020

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

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

Dear Ms. Dortch,

We commend the Commission for its ongoing commitment to expanding broadband connectivity in unserved and underserved rural communities, particularly by maximizing spectrum resources. We thank the Commission for continuing to deliver on this commitment by adopting the Notice of Proposed Rulemaking (NPRM) on TV white spaces (TVWS) put forward by Chairman Pai earlier this year.

Connect Americans Now (CAN) is a coalition of more than 250 organizations and companies representing voices for agriculture, health care, education, small business, technology, veterans, rural advocacy and more — committed to completely eliminating the digital divide in rural America by supporting a mixed-technology approach that leverages the full potential of hybrid network deployments.

In today's technology-driven world, broadband has become a basic necessity. Like water and electricity, it is one of the essential tools to run an effective farming and ranching operation, open up markets for American products and businesses to compete globally, deliver effective health care services, allow students to reach their full potential and provide veterans the services and opportunities they deserve.

For millions of Americans, particularly those living in rural areas, the COVID-19 crisis has exacerbated the many challenges associated with a lack of broadband connectivity. Students without broadband at home can be denied access to the full potential of remote learning, patients may be unable to access telehealth solutions that can keep them healthy and allow them to avoid strained facilities, small businesses can face steep hurdles to adapting their business to reach and serve customers remotely and workers can struggle to telework.

CAN filed comments with the commission on May 4, co-signed by 35 organizations, supporting the swift adoption of updated rules to clear regulatory barriers essential to increasing the pace, scale and cost-effectiveness of TVWS broadband deployments in rural areas.

We write to reiterate our support for rules to permit higher transmit power and higher antennas for fixed white space devices in rural areas, permit higher power mobile operations within geofenced areas and allow for the development of the Internet of Things.

In particular, we wish to restate and emphasize our support for revised rules to permit higher power TVWS operations in the first adjacent channel to broadcasters, alongside mechanisms to prevent interference. It is our understanding that field testing has found appropriate safeguards to prevent TVWS operations from causing any harmful interference into broadcast operations. This component of will be critical to fully unleash the potential of TVWS as a tool to help quickly expand connectivity in rural areas.

We applaud Chairman Pai and the Commission for their continued dedication to eliminating the digital divide and respectfully encourage the Commission to move promptly to implement new rules in 2020 in order to swiftly clear regulatory barriers to TVWS and maximize available spectrum resources to eliminate the rural broadband gap.

Thank you for your consideration on this important matter.

Sincerely,

Richard T. Cullen
Executive Director
Connect Americans Now