

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20554**

In the Matter of )  
 )  
Allocation and Service Rules for the ) IB Docket No. 19-116  
1675-1680 MHz Band )  
 )

**COMMENTS OF CTIA**

CTIA<sup>1</sup> submits these comments in response to the Notice of Proposed Rulemaking (“NPRM”) released by the Federal Communications Commission (“Commission”) proposing to adopt a non-Federal flexible-use allocation and service rules in the 1675-1680 MHz band.<sup>2</sup>

**I. INTRODUCTION.**

CTIA supports the proposal to adopt an allocation for non-Federal flexible wireless use (fixed or mobile) in the 1675-1680 MHz band on a shared basis with Federal operators. Ever-growing consumer demand for mobile broadband requires more spectrum in the hands of commercial wireless operators—through this proceeding the Commission is taking another positive step towards providing the resources to help satisfy that demand. As the Commission itself notes, “[i]n this NPRM, we continue the Commission’s efforts to unleash more spectrum to spur the rollout of wireless network and technologies.”<sup>3</sup> This reallocation is a good-government effort that comports with proposals by multiple Administrations to reallocate the 1675-1680

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<sup>1</sup> CTIA – The Wireless Association® (“CTIA”) ([www.ctia.org](http://www.ctia.org)) represents the U.S. wireless communications industry and the companies throughout the mobile ecosystem that enable Americans to lead a 21st century connected life. The association’s members include wireless carriers, device manufacturers, suppliers as well as apps and content companies. CTIA vigorously advocates at all levels of government for policies that foster continued wireless innovation and investment. The association also coordinates the industry’s voluntary best practices, hosts educational events that promote the wireless industry and co-produces the industry’s leading wireless tradeshow. CTIA was founded in 1984 and is based in Washington, D.C.

<sup>2</sup> *Allocation and Service Rules for the 1675–1680 MHz Band*, Notice of Proposed Rulemaking, FCC 19-43, IB Docket No. 19-116 (rel. May. 13, 2019) (“NPRM”).

<sup>3</sup> *Id.* ¶ 12.

MHz band in budget proposals dating from Fiscal Years 2014 through 2019<sup>4</sup> and will help meet the directive Congress enacted in the RAY BAUM'S Act to identify at least 255 megahertz of spectrum for mobile and fixed wireless broadband by the end of 2022.<sup>5</sup>

## **II. INCREASING DATA DEMANDS REQUIRE NEW SPECTRUM RESOURCES.**

The demand for wireless services among U.S. businesses and consumers continues to astound, and this requires a multitude of spectrum opportunities to keep up. The NPRM observes that subscribers in North America consume more mobile data per smartphone per month than subscribers in nearly any other country, and that North America is expected to have the highest smartphone penetration rate in the world between now and 2025.<sup>6</sup> It is therefore not surprising that mobile data traffic in North America is expected to increase nearly fivefold between 2017 and 2022, at a compound annual growth rate of 36 percent, reaching 5.8 exabytes per month by 2022.<sup>7</sup> Meanwhile, the number of data-only devices in the United States grew 147 percent between 2013 and 2017,<sup>8</sup> and cellular IoT connections are projected to reach 1.5 billion globally by 2022, accounting for more than 30 percent of all cellular connections.<sup>9</sup>

As the wireless industry moves from connecting everyone to connecting everything, substantially more spectrum is necessary to meet growing demand. Flexible rights licensing policies have long been the cornerstone of the United States' successful wireless strategy,

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<sup>4</sup> *See id.* ¶ 5, n.7.

<sup>5</sup> RAY BAUM'S Act of 2018, Pub. L. No. 115-141, Division P § 603(a)(7) (2018).

<sup>6</sup> *Id.* ¶ 4, n.5.

<sup>7</sup> Cisco Visual Networking Index: Forecast and Trends, 2017–2022, CISCO (Nov. 26, 2018), <https://www.cisco.com/c/en/us/solutions/collateral/service-provider/visual-networking-index-vni/whitepaper-c11-741490.html>.

<sup>8</sup> CTIA, The State of Wireless 2018, at 10, [https://api.ctia.org/wp-content/uploads/2018/07/CTIA\\_State-of-Wireless-2018\\_0710.pdf](https://api.ctia.org/wp-content/uploads/2018/07/CTIA_State-of-Wireless-2018_0710.pdf).

<sup>9</sup> Ericsson, Internet of Things Forecast, <https://www.ericsson.com/en/mobility-report/internet-of-thingsforecast> (last visited June 17, 2019).

fostering hundreds of billions of dollars in investment and innovation.<sup>10</sup> Congress, the Administration, and the Commission all recognize the value of flexible-use licenses and are working to allocate additional bands for flexible-use. Exclusive-use licensing provides the certainty to invest billions of dollars in next-generation technologies and deployments. Where sharing is the only viable course towards enabling non-Federal use, the Commission should pursue opportunities to open Federal spectrum through sharing arrangements. As the NPRM observes, the updated Spectrum Relocation Fund (“SRF”) provides cost-reimbursement intended to advance sharing as well as relocation costs,<sup>11</sup> and CTIA encourages stakeholders to make use of the SRF to enable intensive and efficient spectrum sharing in the 1675-1680 MHz band.

**III. THE COMMISSION SHOULD ADOPT AN ALLOCATION FOR NON-FEDERAL FLEXIBLE-USE AND GENERALLY APPLY THE PART 27 RULES TO THE 1675-1680 MHz BAND.**

CTIA generally supports the Commission’s proposals to adopt a co-primary allocation for non-Federal fixed and mobile flexible-use wireless service in the 1675-1680 MHz band.<sup>12</sup> As the NPRM observes, “[m]aking this band available for fixed and mobile (except aeronautical mobile) services could enhance the Commission’s efforts to meet the demand for spectrum of varying characteristics to support next generation wireless networks.”<sup>13</sup> Further, adoption of the proposed allocation and rules will help the Commission satisfy its obligation under the RAY BAUM’S Act to identify additional spectrum for commercial wireless broadband use.<sup>14</sup>

CTIA also generally supports the Commission’s proposal to apply its Part 27 rules to licensees in the 1675-1680 MHz band, including the assignment of spectrum licenses through

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<sup>10</sup> See, e.g., Comments of CTIA Comments, GN Docket No. 18-122, at 20-21 (Oct. 29, 2018).

<sup>11</sup> NPRM ¶ 6.

<sup>12</sup> *Id.* ¶ 13.

<sup>13</sup> *Id.*

<sup>14</sup> RAY BAUM’S Act of 2018, Pub. L. No. 115-141, Division P § 603(a)(7) (2018).

competitive bidding and flexible-use.<sup>15</sup> CTIA also supports adoption of a flexible approach to performance requirements where licensees may meet a population coverage requirement or alternative performance metrics including geographic area coverage or presence in subset units.<sup>16</sup> Consistency in performance requirements among licenses of various frequency bands provides for a stable regulatory framework and incentivizes harmonized network deployment.

Finally, the Commission appropriately seeks comment on how to promote sharing with current and planned Federal use of the 1675-1680 MHz band.<sup>17</sup> With regard to any planned Federal earth stations, CTIA agrees that any sharing framework that is ultimately adopted should strive to “minimize[e] disruption to commercial services and reduc[e] bidder uncertainty.”<sup>18</sup>

#### **IV. CONCLUSION.**

Significant allocations of non-Federal spectrum will be needed to meet growing consumer demand, particularly licensed flexible-use spectrum, and repurposing the 1675-1680 MHz band is a step in the right direction.

Respectfully submitted,

/s/ Kara Graves

Kara Graves  
Director, Regulatory Affairs

Thomas C. Power  
Senior Vice President and General Counsel

Scott K. Bergmann  
Senior Vice President, Regulatory Affairs

**CTIA**  
1400 Sixteenth Street, NW  
Suite 600  
Washington, DC 20036  
(202) 785-0081

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<sup>15</sup> NPRM ¶ 28.

<sup>16</sup> *Id.* ¶¶ 38.

<sup>17</sup> *Id.* ¶¶ 16-18.

<sup>18</sup> *Id.* ¶ 18.