

July 12, 2021

VIA ECFS

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
45 L Street NE
Washington, DC 20554

Re: Promoting the Deployment of Open Radio Access Networks, GN Docket No. 21-63

Dear Ms. Dortch,

We the undersigned wireless network vendors remain highly encouraged by the Commission's Open RAN Notice of Inquiry proceeding, and by its forthcoming Open RAN Solutions Showcase. The Commission must develop policies and rules to "open" the RAN and diversify the vendor ecosystem according to Open RAN principles by requiring vendors to "utilize open interfaces that allow for interoperability."

In keeping with the Commission's technology neutral principles, we note that Open RAN does not dictate a technology choice. Rather, Open RAN is a guiding policy to be adopted by the Commission to ensure both vendor security, and diversity of the supply chain, based on the principles of network elements designed using open and published specifications that can demonstrate and ensure element interoperability.

Commission adoption of an Open RAN policy promotes:

- *Better security.* Open RAN's zero trust security philosophy makes for an inherently more secure network architecture than proprietary RAN. Unlike proprietary RAN's opacity, Open RAN's open interfaces allow baked in transparency that allows network operators to see inside their networks, diagnose, remedy, and prevent problems in real time.
- *Energy efficiency.* Open RAN provides energy efficient features
- *Lower costs.* Open RAN allows for cost savings over proprietary RAN, in both capital expenses and operating expenses.
- *More competition.* Open RAN promotes competition and innovation and strengthens global supply chain diversity.
- *Innovation Empowerment.* Artificial Intelligence and related emerging technologies are transformative to 5G networks and beyond. An Open RAN ecosystem most effectively powers innovation and delivers strategic technologies from a larger group of specialized companies in other industries that are proven to more efficiently deliver to and benefit the marketplace.
- *Supply Chain Diversification.* Congress has recognized the importance of advancing Open RAN architecture to secure and diversify the communications supply chain.¹ The

¹ See, e.g., William M. (Mac) Thornberry National Defense Authorization Act for Fiscal Year 2021, Pub. L. 116-283, § 9202, 134 Stat. 3388, 4788-89 (creating two funds to promote and deploy 5G security, to include open-interface architecture deployment); H. Comm. on Energy & Commerce, *Leading the Wireless Future: Securing American Network Technology*, <https://energycommerce.house.gov/committee-activity/hearings/rescheduled-hearing-on->

Commission can help small and rural vendors in particular obtain secure, cost effective equipment by opening the RAN and keeping it open with Open RAN principles.

- *No vendor “lock-in.”* Choice is the open market’s promise. Open RAN’s multi-vendor approach prevents wireless operators and countries from becoming reliant on a single company to equip and service a network.
- *Scalability.* Open RAN allows operators to dynamically scale their networks based on subscriber demands.
- *Domestic market freedom.* The wireless equipment and services market previously coalesced around unsecure—but cost effective—foreign equipment. Open RAN presents the unique opportunity for domestic vendors and operators to enter the market, or expand services, to provide *secure, domestic, and cost-effective* equipment and services.

Bottom line: The Commission must issue a policy statement or rules that call for carriers to adopt Open RAN principles not only for the replacement of Huawei and ZTE networks, but for all 5G/LTE and commercial radio access networks in the U.S. Doing so will help strengthen our mobile communications infrastructure, provide best technologies to users, and promote a trusted supply chain.

Accordingly, we are highly confident that the record supports the Commission immediately moving to a full rulemaking in its Open RAN proceeding to unlock the RAN.

Sincerely,

/s/ Eric D. Stonestrom

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/s/ Ashraf M. Dahod

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President & Chief Executive Officer
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/s/ Jim Shea

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/s/ Thomas Lambalot

Thomas Lambalot
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NewEdge Signal Solutions

/s/ Steve Papa

Steve Papa
Chief Executive Officer & Chairman
Parallel Wireless

CC: Acting Chairwoman Rosenworcel
Commissioner Carr
Commissioner Starks
Commissioner Simington

[leading-the-wireless-future-securing-american](#) (last visited May. 17, 2021) (congressional hearing discussing appropriations for two 5G security funds created by 2021 NDAA); Endless Frontier Act, S. 1260, § 520, 117th Cong. (legislation introduced May 2021 establishing open network architecture testbed).