

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

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

REPLY COMMENTS OF COMPETITIVE CARRIERS ASSOCIATION

Competitive Carriers Association (“CCA”)¹ submits these reply comments in response to the record and Notice of Proposed Rulemaking (“NPRM”)² seeking to reallocate spectrum in the 1675-1680 MHz band for flexible wireless use on a shared basis with federal users. CCA supports the Federal Communications Commission’s (“FCC” or “Commission”) approach to freeing-up additional mid-band spectrum resources for terrestrial use, which will help to serve the public interest, address growing demand for high-capacity spectrum, and advance next-generation deployments to rural and urban corners of the country. Sharing of spectrum may become an increasingly important strategy in the future, and the Commission should continue to look for creative ways to allocate spectrum for terrestrial wireless services.

I. COMMERCIALIZING THE 1675-1680 MHz BAND IS CRITICAL TO ADDRESS CONSUMER DEMAND AND CONGRESS’ DIRECTIVES

Mobile wireless operators urgently need spectrum resources to meet booming consumer demand for faster, more advanced mobile broadband services. As the NPRM notes, mid-band

¹ CCA is the nation’s leading association for competitive wireless providers and stakeholders across the United States. CCA’s membership includes nearly 100 competitive wireless providers ranging from small, rural carriers serving fewer than 5,000 customers to regional and national providers serving millions of customers. CCA also represents associate members including vendors and suppliers that provide products and services throughout the mobile communications supply chain.

² Notice of Proposed Rulemaking, *Allocation and Service Rules for the 1675-1680 MHz Band*, WT Docket No. 19-116 (rel. May 13, 2019) (“NPRM”).

spectrum like that in the 1675-1680 MHz band is well-suited for deployments that support next-generation technologies such as the Internet of Things (“IoT”) and 5G services.³ The record also highlights that the United States is on the precipice of a technological expansion; as CTIA notes, the number of data-only devices in the United States grew 147 percent between 2013 and 2017 and cellular IoT connections are projected to reach 1.5 billion globally by 2022, accounting for more than 30 percent of all cellular connections.⁴ CCA therefore supports the Commission’s efforts to encourage incumbent spectrum-holding federal agencies to take advantage of sharing opportunities to advance the public interest and help to meet Congress’ directive to identify at least 255 megahertz of spectrum for wireless use by the end of 2022.⁵

Commercializing the 1675-1680 MHz band will enable more efficient use of 5 megahertz of spectrum by fostering shared federal and commercial use of the spectrum to encourage more services to consumers, ignite investment, and increase opportunities for innovation.⁶ Americans everywhere, particularly those in rural communities, depend on reliable mobile broadband services to connect with each other and for critical public safety, economic, and educational needs.⁷ The 1675-1680 MHz block has tremendous potential to ultimately provide enhanced capabilities in these areas including precision agriculture, transportation advancements, and

³ *Id.* ¶ 1.

⁴ See Comments of CTIA, WT Docket No. 19-116 at 2 (filed June 21, 2019) (“CTIA Comments”) (*citing*, CTIA, The State of Wireless 2018, at 10, *available at* https://api.ctia.org/wp-content/uploads/2018/07/CTIA_State-ofWireless-2018_0710.pdf).

⁵ RAY BAUM’S Act of 2018, Pub. L. No. 115-141, Division P § 603(a)(7) (115 Cong.) (2018).

⁶ See, e.g., CTIA Comments; Comments of Ligado, WT Docket No. 19-116 (filed June 21, 2019) (“Ligado Comments”); Comments of The Boeing Company, WT Docket No. 19-116 (filed June 21, 2019).

⁷ NPRM ¶ 4.

health and telemedicine applications. Industries vital to rural regions must have access to mid-band spectrum to support these cutting-edge technologies.

Repurposing the 1675-1680 MHz band also has received longstanding bipartisan support and will assist in fulfilling the Administration's and Congress's goals to repurpose unused government spectrum for private sector use through the RAY BAUM's Act⁸ and the MOBILE NOW Act.⁹ The longstanding record in this proceeding evidences that, "[a]dditional spectrum is clearly necessary for innovative new services, and legacy spectrum allocations, *particularly those held by federal agencies*, will play a critical role in meeting the consumer and marketplace needs for wireless spectrum in the 21st century."¹⁰ The Commission should seize this opportunity to promote more efficient use of spectrum, and pursue creative opportunities to free-up additional mid-band resources, by moving forward with its proposals to reallocate the 1675-1680 MHz band for flexible use.

⁸ See Letter from Hon. Brett Guthrie, Member of Congress, and Hon. Doris Matsui, Member of Congress, *et. al.*, to Tom Wheeler, Chairman, FCC, and Lawrence E. Strickling, Assistant Secretary for Communications and Information Administration, NTIA (Feb. 10, 2016) (members of the House Energy and Commerce Committee strongly encouraging the FCC and NTIA to "continue the push toward reallocating even more government spectrum for commercial use," calling special attention to the 1675-1680 MHz band). Additionally, recent Administration budget requests include language requesting that the FCC either auction or use fee authority to auction and repurpose this spectrum for commercial use. *See also* Fiscal Year 2014 Analytical Perspectives, Budget of the U.S. Government, Office of Management and Budget, at 228– 229; Fiscal Year 2015 Analytical Perspectives, Budget of the U.S. Government, Office of Management and Budget, at 199; Fiscal Year 2016 Analytical Perspectives, Budget of the U.S. Government, Office of Management and Budget, at 215; *and* Fiscal Year 2017 Analytical Perspectives, Budget of the U.S. Government, Office of Management and Budget, at 220.

⁹ Consolidated Appropriations Act, 2018, Pub. L. No. 115-141, Division P (RAY BAUM'S Act of 2018), Title VI (MOBILE NOW Act), §§ 603(a), 605(a), 132 Stat. 348 (2018).

¹⁰ Comments of Public Knowledge and Open Technology Institute at New America, RM-11681, 1 (filed June 21, 2016) ("PK & OTI Comments"). *Id.* at 3 (emphasis supplied).

II. THE FCC SHOULD PURSUE SMART POLICIES FOR ALLOCATION AND AUCTION OF THE 1675-1680 MHz BAND

CCA applauds the FCC's proposal to reallocate the 1675-1680 MHz band for non-federal fixed and mobile flexible use,¹¹ and generally supports the Commission's approach to apply its Part 27 rules to licensees in the band and to assign spectrum licenses through competitive bidding.¹² To provide for the most efficient path forward, CCA also agrees with parties on record who encourage the FCC to auction the 5 megahertz slice of 1675-1680 MHz spectrum as appropriately-sized licenses to encourage investment and innovation in the band. As Ligado notes, this particular swath of spectrum is small and isolated, and a sufficiently-tailored license size would ensure that the band is coordinated to "provide economies of scale" and promote "flexibility in the design and implementation of new services."¹³ Given the size and shared nature of this band, the FCC should pursue policies that minimize the potential for a fragmented spectrum coordination process and enable a more efficient and economically valuable use of the band.

III. CONCLUSION

For the foregoing reasons, CCA urges the Commission to expeditiously pursue its proposals to reallocate the 1675-1680 MHz band for shared use by commercial mobile operators with federal government users, and establish an auction schedule for that spectrum. Tailored policies to provide more mid-band spectrum for mobile use serves the public interest and is supported by the record. Freeing up 1675-1680 MHz will benefit rural and urban consumers,

¹¹ See, e.g., CTIA Comments; *see also* PK & OTP Comments.

¹² NPRM ¶ 28.

¹³ Ligado Comments at 15-16.

whose demand for advanced wireless services underscores the need for efficient, productive spectrum use.

Respectfully submitted,

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