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Nancy Wolff

VP, Hotel Systems, Jumeirah Group

August 8, 2017

The Honorable Ajit Pai, Chairman

The Honorable Michael O’Rielly, Commissioner

The Honorable Mignon Clyburn, Commissioner

Federal Communications Commission

445 12th Street SW

Washington, DC 20554

**Re: Public Notice DA 17-609 regarding petitions to further amend the Commission’s Rules with Regard to Commercial Operations in the 3550-3650 MHz Band, GN Docket No. 12-354**

Dear Chairman Pai, Commissioner Clyburn, and Commissioner O’Rielly,

HTNG would like to provide the following comments in regard to the Public Notice requesting comments on the petitions of T-Mobile and CTIA seeking to change the rules governing the Citizens Broadband Radio Service (Petitions).

**About HTNG**

Hospitality Technology Next Generation (HTNG) is a global not-for-profit trade association that fosters, through collaboration and partnership among hoteliers and technology providers, the development of next-generation solutions that will enable them to do business globally in the 21st century. HTNG’s members include most of the major hospitality companies from around the world, including Best Western International, Four Seasons Hotels & Resorts, Hilton Worldwide, Hyatt Hotels Corporation, Marriott International, and Red Roof Inn.

**The Current CBRS Rules are Important to the Hotel Industry**

HTNG’s members are committed in their dedication to provide the best possible experience for their customers across the United States and throughout the world. Wireless communications have become central to achieving that goal. Wireless technologies are critical to ensuring guests have reliable access to data and voice services, for powering the back-office operations of properties and campuses, and for integrating the internet-of-things (IoT) into hotel operations and the guest experience. Our hotelier members need access to high-quality spectrum resources which support the specialized use cases of hotel properties with localized operations. Telecommunications carriers with regional or national networks are no longer the only enterprises that need access to licensed spectrum with predictable and consistent performance characteristics.

The balance the FCC struck with its Citizens Broadband Radio Service (CBRS) framework provides the opportunity for a wide array of organizations to access such high-quality spectrum. CBRS is an important new spectrum resource that will enhance and expand hotel wireless services in ways not possible with the unlicensed bands currently available to our industry, if the FCC’s rules permit reasonable access to priority access licenses by local investors. The current CBRS rules allow hoteliers to deploy and manage their own small cell LTE networks, at a fraction of the cost of systems on which they currently rely for such coverage. CBRS will give the hotel industry improved autonomy, reliability, and connectivity – and allow them to provide LTE services at many properties where the existing cost model is too high. We foresee wireless services deployed by our members that would utilize the CBRS band frequencies in both the Priority Access License and General Authorized Access modes.

But the only way our members can deploy such CBRS-based services is if the FCC preserves regulatory certainty and access to the local licenses hoteliers need, and does not make the significant changes to the current system sought by the Petitions.  We therefore respectfully urge the FCC to preserve the existing CBRS rules, and to continue to support investment and innovation by the hotel industry.

Respectfully,



Michael Blake

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