



August 28, 2019

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

RE: GHZ Band Proceeding; GN Docket No. 18-122, RM-11791, RM-11778

Dear Ms. Dortch,

The Power and Communication Contractors Association (PCCA) represents contractors, manufacturers, and distributors who build and repair America's power and communications infrastructure, including electric transmission, distribution, and substation facilities and broadband, telephone, and cable television systems. PCCA supports the "5G Plus Plan" jointly submitted by ACA Connects – America's Communications Association, the Competitive Carriers Association, and Charter Communications. Representing 85 percent of the construction companies building broadband infrastructure across the country, we believe this plan will help accelerate the deployment of high-speed broadband service in Rural America while creating tens of thousands of jobs.

The 5G Plus Plan's fiber construction and deployment proposal is both bold and achievable. In order to connect multichannel video programming distributor (MVPD) programmers with reliable fiber program delivery networks, the 5G Plus Plan calls for dedicating \$6-7 billion of C-band auction proceeds to fund the use of 300,000 route miles of existing fiber and the construction of approximately 120,000 route miles over a five-year timeframe. This pace of new fiber deployment is consistent with the amount and speed of current deployments by individual fiber providers and is only a fraction of the total deployment by all industry players in any recent five-year period.

In addition to accelerating the deployment of 5G wireless services, the 5G Plus Plan will provide a robust video program delivery network, significantly expand fiber connectivity for Rural America, and take another step toward closing the digital divide.

Representing the industry responsible for construction broadband infrastructure, PCCA believes the buildout of additional fiber and the estimated costs included in the 5G Plus Plan are reasonable. In a five-year timeframe, permitting and rights-of-way issues that commonly arise in any build out can be sufficiently addressed. Moreover, the project is expected to create more than 100,000 new jobs and help deliver much-needed infrastructure upgrades across the country. Therefore, we see no barriers to successfully implementing the 5G Plus Plan.

Winning the race to 5G is a priority for the United States, and the 5G Plus Plan is the only proposal on record that would unleash sufficient spectrum to meet the demands of 5G while ensuring that existing users of the band and their customers are fully protected and compensated for the costs of this necessary transition.

Best regards,

Dave Aubrey
President