



TECHNET
THE VOICE OF THE
INNOVATION ECONOMY

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August 21, 2017

Ex Parte

Chairman Ajit Pai
Commissioner Mignon Clyburn
Commissioner Michael O’Rielly
Commissioner Brendan Carr
Commissioner Jessica Rosenworcel
Federal Communications Commission
445 12th Street, SW
Washington, D.C. 20554

Re: Expanding the Economic and Innovation Opportunities of Spectrum Through Incentive Auctions, GN Docket No. 12-268; Amendment of Part 15 of the Commission’s Rules for Unlicensed Operations in the Television Bands, Repurposed 600 MHz Band, 600 MHz Guard Bands and Duplex Gap, and Channel 37, ET Docket No. 14-165; Amendment of Parts 15, 73 and 74 of the Commission’s Rules to Provide for the Preservation of One Vacant Channel in the UHF Television Band for Use by White Space Devices and Wireless Microphones, MB Docket No. 15-146; Amendment of Part 15 of the Commission’s Rules for Unlicensed White Space Devices, ET Docket No. 16-56; Exploring Flexible Use in Mid-Band Spectrum Between 3.7 GHz and 24 GHz, GN Docket No. 17-183

Dear Chairman Pai, Commissioner Clyburn, Commissioner O’Rielly, Commissioner Carr, and Commissioner Rosenworcel:

TechNet is the national, bipartisan network of technology CEOs and senior executives that promotes the growth of the innovation economy by advocating a targeted policy agenda at the federal and 50-state level. Our diverse membership includes dynamic startups and the most iconic companies on the planet and represents more than 2.5 million employees in the fields of information technology, e-commerce, the sharing and gig economies, advanced energy, biotechnology, venture capital, and finance.

In America today, broadband connectivity is a crucial lifeline for our residents, communities, and economy. It connects consumers and businesses to critical services and information that is stored on cloud computing platforms. Without broadband connectivity, businesses cannot be as productive as they need to be to compete in today’s economy, and it is more difficult for consumers to access critical educational, health care, and governmental services, among other needs. Today,

approximately 34 million Americans currently lack basic broadband access. The majority of these people — about 24 million — live in rural areas that simply do not have the infrastructure required to enable the sort of broadband connectivity that is an integral part of everyday life for many of us.

For the United States to truly consider itself a world leader in innovation, steps must be taken to improve broadband connectivity. TechNet appreciates and applauds the FCC's work generally in making unlicensed spectrum available to address broadband, such as its recently adopted Notice of Inquiry that includes questions about unlicensed use of 6 GHz. That spectrum, adjacent to the existing 5 GHz band, is important to the long term future of unlicensed broadband technologies. Today, however, we write to you about the issues surrounding the use of television white spaces (TVWS), in part because TechNet member companies have been very active in pursuing regulations that will allow the TVWS band to be successfully utilized.

TechNet is respectfully calling on the FCC to facilitate an environment in which unlicensed broadband technologies using low band spectrum (the so-called "TV white spaces") can flourish. Taking this action, including preserving the availability of three 6 MHz-wide TV white space channels in every market across the country, will allow providers to make broadband more widely available and improve the lives of millions.

TV white spaces are the unused gaps in our existing low-frequency spectrum, and they can be used to provide broadband in much the same way that a conventional Wi-Fi connection signal does. While a strong Wi-Fi signal is typically very expensive and only covers a radius of up to 300 meters, TV white spaces can cover anywhere between 750 meters and 9 miles. These low-frequency signals are also capable of traversing the physical barriers and long distances that make internet access for rural communities such a challenge.

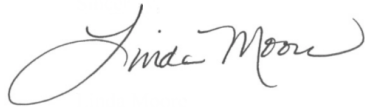
Several TV white spaces projects have already been successful in underserved rural communities across the U.S. For example, TV white spaces technology in Virginia connects more than 7,500 students to their school networks from home, allowing them to access online resources for homework and other projects. In Washington state, a TV white spaces project enables local farmers to use sophisticated analytics software and cloud computing to help them grow their crops more efficiently.

For these rural students and farmers, broadband access unlocks a world of opportunities that they would otherwise lack. Efforts to expand TV white spaces can help bring greater student achievement, agricultural production, medical care, government services, and a host of other benefits to the communities that need them.

The FCC has opened a number of dockets making proposals and adopting rules for how unlicensed technologies can use white spaces and has acknowledged that access to a national footprint of sufficient unlicensed spectrum is needed to drive production of affordable TV white spaces technology. Over the last decade, the FCC

has done tremendous work on this issue to deliver an essential broadband opportunity to the nation. We urge the FCC to address the outstanding issues as soon as possible and ask that you take the final regulatory steps that are needed to provide regulatory certainty and allow operators to fulfill that potential of TV white spaces technology. Thank you for considering this matter and please do not hesitate to contact me about this if I can be of assistance.

Sincerely,

A handwritten signature in cursive script that reads "Linda Moore".

Linda Moore
President & CEO

cc: Rachael Bender
Daudeline Meme
Erin McGrath
Nirali Patel