

September 14, 2017

Chairman Ajit Pai
Federal Communications Commission
445 12th Street, SW
Washington, D.C. 20554

Commissioner Mignon Clyburn
Federal Communications Commission
445 12th Street, SW
Washington, D.C. 20554

Commissioner Michael O'Rielly
Federal Communications Commission
445 12th Street, SW
Washington, D.C. 20554

Commissioner Jessica Rosenworcel
Federal Communications Commission
445 12th Street, SW
Washington, D.C. 20554

Commissioner Brendan Carr
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 Chanel 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 Spaces 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)

Dear Chairman Pai and Commissioners Clyburn, O'Rielly, Rosenworcel, and Carr:

As the Federal Communications Commission (FCC) begins to repackage spectrum following the conclusion of the incentive auction, the undersigned organizations urge you to set aside at least three 6 MHz television white space channels in each media market across the United States to help enable affordable broadband internet access in regions where deployment has otherwise been difficult to achieve.

According to the 2016 Broadband Progress Report, 34 million (10 percent of all Americans) do not have access to broadband service at current FCC minimum standards of 25 Mbps download/3Mbps upload speeds for fixed services; 23 million people (39 percent of rural Americans) lack access to broadband; and 1.6 million people (41 percent of Americans living on tribal lands) do not have access to broadband.¹ The unused spectrum between broadcast television stations, also known as television white spaces (TVWS), represents a valuable opportunity to expand broadband in these areas of the country.

TVWS can be used to access broadband internet using a database manager and white space radios. TVWS signals have the ability to travel further than standard Wi-Fi signals, and, in the

lower frequencies, can penetrate through obstacles and cover uneven ground with less infrastructure.² TVWS therefore has the potential to revolutionize broadband internet accessibility in rural areas.

Technology companies are proposing the use of TVWS to help bridge the digital divide. For example, on July 11, 2017, Microsoft announced it would be starting TVWS broadband programs in 12 states, including Arizona, Kansas, New York and Virginia.³ One would expect that as this technology evolves, other companies will quickly follow suit.

The FCC should maintain the rules it adopted in its Unlicensed Operations in the TV Band proceeding (ET Docket No. 14-165), which enables devices to operate on channel 37 (608-614 MHz) as well as within the duplex gap (652-663 MHz), which was created by the incentive auction. In addition, we urge the commission to finalize the vacant channel proceeding (MB Docket 15-146), and preserve a vacant channel in each market in the post-auction broadcast TV band (54-608 MHz).

By ensuring that three usable TV channels are available for white space broadband transmission purposes in every market in the country, the commission will free spectrum from existing regulatory limitations and make it available for highly beneficial and efficient broadband internet use.⁴

We appreciate and support your efforts to provide for new, innovative uses of TVWS in order to increase access to broadband internet service.

Sincerely,

American Conservative Union
American Consumer Institute
Citizens Against Government Waste
Free the People
FreedomWorks
Heritage Action
Less Government
Small Business Exchange Council
Taxpayers Protection Alliance
The Committee for Justice

¹ “2016 Broadband Progress Report,” Federal Communications Commission, January 29, 2016, <https://www.fcc.gov/reports-research/reports/broadband-progress-reports/2016-broadband-progress-report>.

² “TV White Space – Breakthrough Technology,” Carlson Wireless, <http://www.carlsonwireless.com/tv-white-space/>.

³ Celia Kang, “To Close Digital Divide, Microsoft to Harness Unused Television Channels,” *The New York Times*, July 11, 2017, <https://www.nytimes.com/2017/07/11/technology/to-close-digital-divide-microsoft-to-harness-unused-television-channels.html>.

⁴ Alden Abbot, “Microsoft’s Plan to Expand Broadband Would Benefit Rural Americans,” *The Daily Signal*, August 7, 2017, <http://dailysignal.com/2017/08/07/microsofts-plan-to-expand-broadband-would-benefit-rural-americans/>.