



December 10, 2020

Chairman Ajit Pai
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Commissioner Michael O’Rielly
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Commissioner Brendan Carr
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Commissioner Jessica Rosenworcel
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Commissioner Geoffrey Starks
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Rules Governing the Use of Distributed Transmission System Technologies, MB Docket No. 20-74; Authorizing Permissive Use of the “Next Generation” Broadcast Television Standard; GN Docket No. 16-142

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

Connect Americans Now (CAN) writes to respectfully express concern with the recent draft Report and Order on proposed changes to the distributed transmission system (DTS) rules which would adversely affect the availability of TV white space (TVWS) spectrum as an important tool to expand broadband connectivity.

CAN is a coalition of more than 275 organizations and companies representing voices for agriculture, health care, education, small business, technology, veterans, rural advocacy and more — committed to completely and swiftly eliminating the digital divide in America through an all-of-the-above approach.

As CAN wrote in an *ex parte* on November 17, we believe broadcast stations provide a critical service for Americans and that the Commission’s current DTS rules do not prevent stations from reaching their audiences. The proposed DTS changes, however, would allow broadcasters to transmit beyond their existing service area without a clearly defined need for such an expansion and undermine the Commission’s recent progress to unleash the full potential of TVWS technology as a critical tool to help eliminate the broadband gap in areas of low population density and challenging topography.

While the draft order possibly improves upon an earlier Notice of Proposed Rulemaking by reducing the scope of the service area expansion, we expect that the proposed rules would still adversely affect the availability of TVWS spectrum for broadband deployment. In particular, allowing broadcasters to transmit beyond their service areas will create spillover into TVWS spectrum, substantially reducing the area available for TVWS device operation and thereby limiting the potential for the technology to expand broadband connectivity.

In short, while we understand that the draft order stipulates that broadcast signals beyond service areas will not be protected from interference, they would still retain the potential to create harmful interference into TVWS devices operating nearby. By allowing broadcasters to operate outside their service areas, we also believe this draft order would create the conditions for stations to



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seek interference protections in the future, potentially further undermining the use of TVWS to expand broadband connectivity in many of America's hardest to reach areas on the wrong side of the digital divide.

These changes would generate uncertainty, and future controversy, around the use of TVWS as a broadband solution, substantially reducing the positive impact of the Commission's commendable recent action to clear regulatory barriers to innovation to help bridge the digital divide by unanimously adopting updated TVWS rules.

We commend the Commission for demonstrating an ongoing and bipartisan commitment to maximizing spectrum resources to expand broadband connectivity for Americans stuck behind the digital divide. We respectfully ask the FCC to continue to act on that commitment by eliminating the changes proposed in the draft order on DTS rules that would reduce the spectrum available to support the use of TVWS technology to enhance the reach and cost-effectiveness of broadband deployments.

Thank you for your attention on this matter and for all your work to close the broadband gap.

Sincerely,

Richard Cullen
Executive Director
Connect Americans Now