

# LGBT Technology Partnership

June 19, 2015

VIA ELECTRONIC FILING

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street S.W.  
Washington, D.C. 20554

RE: Incentive Auctions, No. 12-268, Spectrum Aggregation, No. 12-269

Dear Ms. Dortch:

The LGBT Technology Partnership (“Partnership”) is an organization that is dedicated to driving research, analysis, education, and advocacy at the intersection of the LGBT community and technology in order to advance civil rights and social inclusion. As some of the research the Partnership has filed with the Commission in the past has highlighted, access to mobile broadband is extremely important to our community. Many studies have shown that LGBT individuals more often prefer to connect using mobile devices, are early adopters of technology and rely on the Internet for health and identity formation information.

For these reasons and many others outlined in the documents submitted in this filing, the Partnership encourages the Commission to create an incentive auction structure that allows all participants to compete equally to secure the spectrum needed to support the mobile broadband needs of all consumers, especially the LGBT community. An open auction unencumbered by restrictions will encourage mobile broadband providers to invest in their networks and rapidly deploy the newly-purchased spectrum to keep pace with consumers’ continuously increasing demand for mobile services. If structured properly, the incentive auction also promises to bring in billions of dollars for the U.S. Treasury, which will help support social programs essential for our communities.

Respectfully Submitted,

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Christopher Wood  
Executive Director  
LGBT Technology Partnership

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## Mobile Connectivity for LGBT – More Than Just a Connection to Friends

As avid, daily mobile phone users, we don't often spend a lot of time thinking about how our texts, emails or Snapchats move from one phone to another. We pick up our device, we hit send on one of the hundreds of apps we have downloaded and almost instantly, it arrives on our friend's device.

In the beginning of cell phone technology, we could only make phone calls. Then, text messages were introduced (up to 140 characters) and shortly thereafter, the ability to send pictures was all-the rave. Now we are able to send, upload, download or watch videos, including our favorite sitcom episodes, and even live stream webinars, movies and events. We can experience our friends' vacations with them, regardless of our geographic location through their social media via selfies, videos and filtered photos. We can gather all of the latest news stories, and even download a 1GB PowerPoint for a 3 hour presentation.

All of this is happening on one, two or three mobile devices for hundreds of millions of users at any given moment during the day. We are downloading and uploading hundreds of terabytes of information from almost any given point around the country over wireless broadband, and we often don't stop to think, "This was not possible just 10 or 15 years ago." Back then, it was hard enough to get a picture to load on our home computer attached to a wired, dial-up connection.

For the LGBT community, the ability to connect to the Internet has been absolutely critical -- crucial to communication, education, and as a means to support one another and to begin raising awareness of the issues the community faces. This is no different when it comes to wireless technology and, based on our research, mobile phones are sometimes more important than connecting over wired options. In fact, over 55% of LGBT individuals prefer to use a mobile device over a laptop or desktop.

Over the last 20 years, the LGBT community's ability to meet others that they can identify with has changed dramatically. In a recent study, we found that over 50% of LGBT individuals use the Internet, such as apps to meet new people and find others they can relate to. But it is not just about meeting new people. It is about health and safety, especially for LGBT youth. Surveys have shown that 81% of youth who identify as LGBT have used their connection to the Internet to search for health information compared to 46% of non-LGBT youth.

The important fact for the average mobile phone user to recognize is that the increased capabilities of mobile devices are dependent upon a finite resource – wireless spectrum, which is the airwaves that carry information from your phone back and forth to the nearest antennas located all around us. That spectrum can only

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carry so much information at one time, from so many mobile devices such as cell phones, tablets, personal healthcare monitors, driving navigator, etc. The Federal Communications Commission (FCC) has worked tirelessly to engage with those holding large amounts of spectrum, such as the Federal government and television broadcasters, to free up additional spectrum to be used by the public for mobile broadband. If not for the FCC's efforts to increase the deployment of spectrum, we would still have very limited capabilities when it comes to the mobile technology we all use and depend on every day.

If the FCC is making such a concerted effort to free up more spectrum, then why are we worried about the future?

Next year, the FCC is scheduled to auction off valuable spectrum that is currently licensed and held by television broadcasters to be purchased by wireless companies who can convert the old broadcast TV spectrum into more useful services for consumers like you. This next generation of spectrum could transform the way we live, work and play by unleashing the exciting new world of "Internet of Things." We are concerned because even with the additional spectrum being auctioned off to wireless carriers, many experts are worried that we are going to hit another "Spectrum Crunch" where demand for mobile broadband surpasses the available capacity.

Later this year the FCC will finalize the rules that will be used to govern these spectrum auctions, and if they do not set fair rules, consumers could lose the most. It is crucial for our community and consumers in general that the FCC sets rules for the spectrum auction to ensure that spectrum purchased is put to use in certain timeframes so as to prevent this vital resource from lying fallow.

As is so typical in Washington, DC, there are some companies who are urging the FCC to adopt rules that would tilt the playing field in their favor, by requiring the government to set aside big portions of this valuable spectrum to be given to only certain companies, and at a discounted price. We don't think this is right.

Everyone should play by the same rules, and the FCC should not play favorites among all of the wireless carriers who are already competing vigorously in the market to earn their customers. The government should let the competitive auction process decide who receives what spectrum and at what price, by allowing all eligible companies to bid what they want to bid.

Not only does this ensure companies are more willing to deploy the newly purchased spectrum to recoup their investment but also ensures taxpayers see the benefit of the spectrum auction by having billions of dollars return to the US treasury to support essential program for our communities. Many of these programs

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we've watched slowly slip away as the strain on our countries financial resources continues to increase.

Given how important mobile broadband is to the LGBT community, it's important that the FCC gets the auction rules right by ensuring fair and open process for all bidders, not favoring one company over another through unreasonable set asides.

