



One Voice Representing the Asian American, Native Hawaiian and Pacific Islander
Business Community Across the Country

July 31, 2015

The Honorable Thomas Wheeler
U.S. Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: GN Docket No. 12-268, WT Docket No. 12-269, AU Docket No. 14-252

Dear Chairman Wheeler:

As the Federal Communications Commission considers rules for the upcoming spectrum incentive auctions, we write to urge you to adopt a policy designed to maximize the availability of spectrum for all qualified private sector providers while giving the government the ability to raise the most amount of needed funds to address budget deficit concerns.

We also write to introduce our organization, the Asian/Pacific Islander American Chamber of Commerce and Entrepreneurship (National ACE), which is a national organization that gives voice to the business interests of Asian Americans and Pacific Islanders.

Founded in 2012 and based in Washington, DC, National ACE's mission is to serve as a strong advocate of Asian American and Pacific Islander business interests and to affect positive change on all issues that enhance and advance the goals and aspirations of our community's business owners, entrepreneurs and corporate leaders.

We have a particular interest in technology and communications policy issues because numerous studies have confirmed that Asian Americans and Pacific Islanders are early adopters of high tech products and services. Asian Americans are also highly active and represented in the entrepreneurial and workforce side of these industries as well as on the consumer side.

As you may know, Asian Americans and Pacific Islanders are the fastest growing ethnic group in America, having increased 46% from 2000 to 2010. According to a 2010 Census Bureau Population Survey on Internet Use, Asian American households exhibited the highest rates of home computer ownership (86%) and broadband service (81%), followed by White households (80% owned a computer and 72% had home broadband Internet services).

A 2011 Pew Research Center Internet & American Life Project presentation found that 74% of Asian American Internet users sent or received email within the past 24 hours, compared to 61% of the general population. The study also found that 83% of Asian American Internet users receive their news from online sources, compared to 58% of the general population. Further, 65% of Asian American Internet users are active with social networking, compared to 44% of the general population.

Just last month, Nielsen issued a "2015 Asian American Consumer" report which found that Asian Americans are "avid adopters of digital devices and social media." Nielsen found that Asian Americans exceed the general population in smartphone ownership and in the number of households with tablets, smart TVs, video game consoles and multimedia devices that stream content, are more likely than non-Hispanic whites to agree that the Internet is a source of entertainment and a good platform for banking and shopping, are 60% more likely than non-Hispanic whites to download or stream music, and 46% more likely than non-Hispanic whites to use an online music-streaming service.

Based on these trends, National ACE has a strong interest in government policies that promote this vibrant sector of our economy to the benefit of Asian American consumers. Yet, we are concerned that if the FCC does not free up more spectrum for the private sector to keep up with the tremendous demands, our nation may face a spectrum crunch.

To ensure that maximum amount of spectrum is made available to those commercial providers who actually serve the public and not to any private entity that solely seeks investment opportunities, National ACE believes it is important for the FCC to conduct the upcoming incentive auctions in a way that will promote robust competition among all bidders. To us, this means that every business qualified to compete should be able to do so under the same set of rules and not one that tilts the level playing field in favor of some companies over others through excessive set asides.

As an advocate for businesses owned by Asian Americans, National ACE is generally supportive of corporate or governmental supplier diversity programs that set aside certain opportunities for minority- or women-owned small businesses. Yet, we believe it is also very important for set aside programs to be targeted and designed narrowly so that large companies that do not need any additional assistance from the government cannot abuse the program.

We understand that you are considering setting aside certain markets and licenses in the upcoming incentive auctions. We hope the final rules that the FCC adopts will meet the policy goals of assisting legitimately disadvantaged businesses deserving of special treatment by the government by limiting the set asides, and not allow for a windfall to large companies that are doing fine on their own.

Thank you for your leadership in promoting a robust technology and communications industry by developing policies that will ensure strong competition and consumer benefits. We wish you success on the upcoming incentive auctions and we stand ready to support you.

Sincerely,



Sach Takayasu
President & CEO