



November 15, 2011

Via Electronic Filing

Marlene H. Dortch, Secretary
Federal Communications Commission
445 Twelfth Street, SW
Washington, DC 20554

Re: *Written ex parte presentation, ET Docket No. 10-123*

Dear Ms. Dortch:

On November 10, 2011, Jonathan Spalter, Chairman of Mobile Future, sent the attached letter to the Honorable Lawrence E. Strickling, Assistant Secretary for Communications and Information at the National Telecommunications and Information Administration (“NTIA”) to encourage the reallocation of the 1755-1780 MHz band of spectrum without delay. A copy of the letter, which highlights the exploding demand for wireless services and the urgent need for additional spectrum to allow for continued mobile innovation, was sent to Chairman Julius Genachowski.

Pursuant to Section 1.1206 of the Commission’s rules, a copy of this letter is being filed via ECFS with your office. Please do not hesitate to contact the undersigned with any questions.

Respectfully submitted,

/s/ Jonathan Spalter

Jonathan Spalter, Chairman
Allison Remsen, Executive Director
Mobile Future
1325 Pennsylvania Avenue, N.W., Suite 600
Washington, D.C. 20004
202-756-4154
www.mobilefuture.org

November 10, 2011

The Honorable Lawrence E. Strickling
Assistant Secretary for Communication and Information
National Telecommunications and Information Administration
U.S. Department of Commerce
1401 Constitution Ave., N.W.
Washington, DC 20230

Dear Assistant Secretary Strickling:

The mobile innovation community appreciates the daunting yet vital task that NTIA, working with the FCC, has undertaken to achieve President Obama's vital goal of identifying and making available 500 MHz of spectrum over the next 10 years for wireless use. NTIA's efforts to advance the President's spectrum initiative and unleash a mobile-broadband revolution will create much-needed jobs and advance innovation throughout our economy. As a part of this effort, we strongly urge you to quickly free spectrum to enable the ongoing, rapid expansion of the mobile Internet, starting with repurposing the 1755-1780 MHz band for commercial mobile services without delay.

With the upcoming release of analysis of the larger 1755-1850 MHz band, Mobile Future urges immediate reallocation of the 1755-1780 MHz portion. Rapid reallocation of this targeted band of spectrum can become an early success story for the President's spectrum initiative, helping avert the threat of spectrum exhaust. This move is crucial to providing interim relief while other government bands, as well as voluntary incentive auctions of broadcast spectrum, are considered. It also would deliver positive long-term impacts on consumers and our mobile innovation economy.

Nowhere is the opportunity so vast, the need so urgent, and the policy so vital for achieving early and demonstrable results from the President's spectrum initiative.

Because of its location immediately adjacent to spectrum already used for commercial mobile services, this band is ideal for an urgently needed effort to stave off the threat of impending spectrum exhaust and its negative impacts on consumers and our mobile innovation economy. If paired with the AWS-3 band, estimates show this spectrum would raise \$12 billion of needed auction revenue.¹ To put this job-creating spectrum to work as soon as possible, it is critical that reallocation of spectrum is not delayed.

Today, our nation's wireless community—from applications developers to device makers to service providers—supports 2.4 million American jobs and contributes \$100 billion annually to the U.S. GDP. To maintain this momentum, wireless companies have steadily invested \$20-\$25 billion each of the last five years to upgrade and expand mobile infrastructure. Now, the government must make more of this finite resource available to allow these networks to continue to expand.

Time is of the essence. Consider these facts:

¹ Coleman Bazelon, The Brattle Group, Inc., *The Economic Basis of Spectrum Value: Pairing AWS-3 with the 1755 MHz Band is More Valuable than Pairing it with Frequencies from the 1690 MHz Band* (2011), <http://www.brattle.com/documents/UploadLibrary/Upload938.pdf>.

- A recent report by Credit Suisse finds that U.S. wireless networks already today run at 80% of capacity on a typical day—well above the global average of 65%²;
- Cisco estimates that wireless Internet traffic in North America will grow more than 20-fold from 2010 to 2015³; and
- Without additional spectrum capacity, analysis by engineer Peter Rysavy finds that demand for U.S. wireless networks will outstrip existing capacity in as little as four years' time.⁴

By contrast, swiftly making more spectrum available will relieve spectrum exhaust while aiding economic growth and job creation. If the President is successful in his push for an additional 500 MHz of spectrum to expand the mobile Internet, the Analysis Group conservatively estimates that we can create 500,000 American jobs and add \$400 billion to the nation's GDP.⁵ This progress must be encouraged—and advanced now.

Repurposing the 1755-1780 MHz spectrum band now will bring urgently needed interim relief to the spectrum crunch caused by soaring U.S. consumer and business demand for mobile Internet. We hope you act expeditiously to advance this powerful engine of economic growth, and we would be happy to meet with you or any members of your staff, if we can be a further resource as you advance your important work.

Sincerely,



Jonathan Spalter, Chairman
Mobile Future
1325 Pennsylvania Avenue, NW
Suite 600
Washington, DC 20004
www.mobilefuture.org

CC: Jack Lew, Director, Office of Management and Budget
Chairman Julius Genachowski, Federal Communications Commission

² Credit Suisse, *Global Wireless Capex Survey – A Multi-year Spending Cycle*, (July, 2011).

³ Cisco, *Cisco Visual Networking Index: Forecast and Methodology, 2010-2015*, at p.6 (June 1, 2011) available at http://www.cisco.com/en/US/solutions/collateral/ns341/ns525/ns537/ns705/ns827/white_paper_c11-481360.pdf.

⁴ Peter Rysavy, *The Spectrum Imperative: Mobile Broadband Spectrum and Its Impacts for U.S. Consumers and the Economy*, (Mar. 16, 2011) available at http://www.rysavy.com/Articles/2011_03_Spectrum_Effects.pdf.

⁵ David W. Sosa and Marc Van Audenrode, Analysis Group, *Private Sector Investment and Employment Impacts of Reassigning Spectrum to Mobile Broadband in the United States*, (Aug. 2011).