



April 11, 2014

Chairman Tom Wheeler
Commissioner Mignon Clyburn
Commissioner Jessica Rosenworcel
Commissioner Ajit Pai
Commissioner Michael O’Rielly
Federal Communications Commission
445 12th St, S.W.
Washington, D.C. 20554

EX PARTE PRESENTATION

Expanding the Economic and Innovation Opportunities of Spectrum Through Incentive Auctions, GN Docket 12-268;

Amendment of the Commission’s Rules with regard to Commercial Operations in the 3550-3650 MHz Band, GN Docket No. 12-354;

Revision of Part 15 of the Commission’s Rules to Permit Unlicensed National Information Infrastructure (U-NII) Devices in the 5 GHz Band, ET Docket No. 13-49.

Dear Mr. Chairman and Commissioners,

The Schools, Health & Libraries Broadband (SHLB) Coalition¹ writes in support of making more unlicensed spectrum available in the pending 600 MHz proceeding. The availability of wireless Internet access is extremely important to anchor institutions. Nationwide availability of “white spaces” spectrum in the TV bands will give schools, libraries, health clinics and other anchors an additional, lower cost option for accessing the Internet and help them deliver much needed services to urban and rural America. Robust wireless networks using the “white spaces” portion of the TV band have the potential to enable high-speed mobile and portable applications and extend broadband coverage to and from community anchor institutions in a cost-effective manner.

Students and teachers are already heavy users of WiFi Internet access, and the growth of one-to-one laptop initiatives in schools will lead to overcrowding and congestion of existing WiFi spectrum in the very near future. Furthermore, public libraries specialize in making their WiFi

¹ The SHLB Coalition is a broad-based coalition of non-profit and for-profit organizations that share the goal of ensuring open, affordable, high-capacity broadband for anchor institutions and their communities. A list of our members is available at www.shlb.org.

services available to the general public, and almost all library now offers free WiFi service to the general public.²

Schools, libraries and health care facilities could be among the biggest beneficiaries of additional unlicensed access to the vacant TV channel spectrum. The next generation of WiFi service enabled by freeing up the “white spaces” spectrum will improve the coverage, capacity and quality of campus and anchor institution networks, while also lowering costs by requiring many fewer access points. It will enable the unfolding digital revolution, which will enhance the teaching, healthcare and learning experiences of students, teachers, medical professionals, patients and underprivileged members of our society. Opening this low-frequency spectrum for unlicensed access will also encourage more public hotspots, community networks and mobile broadband access for the people served by community anchor institutions.

These benefits will only accrue if the FCC makes sufficient amounts of spectrum below 700 MHz available for unlicensed use in every market nationwide. The lower-frequency spectrum in the TV bands has favorable propagation characteristics that make it uniquely capable of extending farther and around obstacles such as trees and buildings. It is imperative that the FCC set aside enough spectrum in the lower frequency bands to seed the market and give equipment manufacturers the confidence and scale to lower the prices for equipment and devices.

White spaces spectrum is especially important for rural America. As reflected in the “expressions of interest” filed by the Iowa Communications Network and the West Virginia Network for Educational Telecomputing in the Connect America Fund proceeding, “white spaces” services can benefit thousands of community anchor institutions in rural areas.

For all these reasons, the FCC should make every effort to provide sufficient unlicensed spectrum below 700 MHz to create a national “white spaces” market that gives community anchor institutions, especially those in rural areas, a low-cost option to expand their wireless Internet capacity. Making adequate amounts of unlicensed spectrum available in this band is necessary to help serve the increasing broadband needs of community anchor institutions and the general public throughout the country.

Sincerely



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² <http://www.ala.org/tools/libfactsheets/alalibraryfactsheet06>.