

Before the  
**NATIONAL TELECOMMUNICATIONS AND INFORMATION  
ADMINISTRATION, U.S. DEPARTMENT OF COMMERCE**  
and the  
**RURAL UTILITY SERVICE, U.S. DEPARTMENT OF AGRICULTURE**

In the Matter of	)	
	)	
Broadband Initiatives Program and Broadband	)	Docket No. 0907141137-91375-05
Technology Opportunities Program	)	
	)	RIN: 0660-ZA28

**Comments of Shared Spectrum Company**

Shared Spectrum Company (SSC) respectfully submits these comments in response to the Joint Request for Information (RFI) issued by the National Telecommunications and Information Administration (NTIA) and the Rural Utility Service (RUS) seeking comment on certain issues relating to the implementation of the Broadband Initiatives Program (BIP) and the Broadband Technology Opportunities Program (BTOP) for the second round of funding under these programs.<sup>1</sup> SSC's brief comments address the RFI's questions on targeted projects that should be funded by the agencies. Specifically, SSC strongly recommends that a small portion of the BTOP dollars be used to fund test-bed or proof of concept projects that will demonstrate innovative and effective ways of getting broadband into hard-to-reach communities with new advanced wireless technologies.

SSC is a small business that has developed innovative broadband wireless technology that will help achieve the goals of the broadband provisions of the American Recovery and

---

<sup>1</sup> *Request for Information*, 74 Fed. Reg. 58940 (Nov. 16, 2009).

Reinvestment Act of 2009 (Recovery Act).<sup>2</sup> SSC's comments in response to the first RFI urged NTIA to encourage deployment of advanced technology and described the benefits of incorporating new technologies such as Dynamic Spectrum Access (DSA).<sup>3</sup> However, the first Notice of Funds Availability (NOFA)<sup>4</sup> was biased toward so-called "shovel-ready" projects that proposed using current, off-the-shelf technology, precluding SSC from applying for BTOP funds for purposes of demonstrating DSA-enabled wireless broadband technology even as the NTIA evaluates SSC's devices as the first participant in the Spectrum Sharing Innovation Test-Bed pilot program.<sup>5</sup> The new NOFA should invite proposals to conduct field trials of such innovative and advanced broadband technology in rural, unserved and underserved areas.

NTIA has broad authority under the Recovery Act to "undertake such other projects and activities as the Assistant Secretary finds to be consistent with the purposes for which the program is established."<sup>6</sup> Under this authority, NTIA can put the "T" (for technology) back into the BTOP program by showcasing new and innovative technologies such as DSA that can, in the long run, provide the most "bang for the buck," leading to affordable and sustainable wireless broadband service in rural, unserved and underserved areas.

Accordingly, NTIA should set aside at least \$100-150 million for innovation-focused projects, some of which could support participants in Phases 2 and 3 of the Spectrum Sharing Innovation Test Bed to the extent that participants/applicants will be deploying broadband

---

<sup>2</sup> Pub. L. No. 111-5, § 6001(b), 123 Stat. 115 (2009).

<sup>3</sup> See Shared Spectrum Company, *Comments* in Docket No. 090309298-9299-01 (Apr. 13, 2009), available at <http://www.ntia.doc.gov/broadbandgrants/comments/7A97.pdf>.

<sup>4</sup> 74 Fed. Reg. 33103 (July 9, 2009).

<sup>5</sup> See <http://www.ntia.doc.gov/frnotices/2006/spectrumshare/comments.htm>.

<sup>6</sup> Recovery Act, § 6001(g)(6) (emphasis added).

technology that has achieved a technical readiness level (TRL) that is capable of long-term (1-2 years) field testing in rural environments.

Respectfully submitted,

/S/ Peter A. Tenhula

Peter A. Tenhula

Vice President and General Counsel

**SHARED SPECTRUM COMPANY**

1595 Spring Hill Road, Suite 110

Vienna, VA 22182

703-761-2818

DATED: November 30, 2009