



Center for Strategic & International Studies
Washington, DC

March 12, 2004

Norbert Schroeder
Strategic Spectrum Planning and Reform Division
National Telecommunications and Information Administration
1401 Constitution Avenue, N.W., Room 4082
Washington, DC 20230.

Dear Mr. Schroeder:

The United States Department of Commerce's National Telecommunications and Information Administration (NTIA) has asked for comments on policy reforms relative to the management of the natural resource known as the "radio frequency spectrum." We would like to provide as a comment the Report of the Center for Strategic and International Studies Spectrum Commission, "Spectrum Management for the 21st Century."

This report deals with most areas of interest to the policy review and has specific recommendations on how to improve spectrum management in the United States. The five recommendations are:

- Develop a comprehensive national strategy from the White House for spectrum use that addresses economic and security issues and creates a roadmap for change;
- Establish a senior NSC/NEC position for spectrum management and a senior-level Policy Coordinating Committee to develop policy, ensure coordination and responsiveness, and resolve disputes;
- Concentrate responsibility for spectrum-related international activities including the World Radiocommunication Conference in a permanent, well-resourced ambassadorial position at the State Department;
- Create a White House advisory group for national spectrum issues.

Set up a public/private research consortium for spectrum that would develop a roadmap for U.S. research and development intentions in spectrum-using technologies and promote their adoption and exploitation. This organization could also provide independent assessment of spectrum use to support the White House and a Senior Advisory Group.

The report goes into the rationale for these recommendations in some detail. For this letter, we would like to highlight one recommendation in particular – the importance of having a permanent White House body made responsible for spectrum policy. Our view is that without this permanent body, spectrum management reform will fail.

The Report recommends that this take the form of a Policy Coordinating Committee placed in the structure of the National Security and National Economic Councils. This body would meet on an as-needed basis and be composed of Assistant Secretary level representatives from the appropriate agencies and the FCC. Some agencies or White House offices may be concerned that the creation of this Committee would lead to a diminution of their authority over spectrum issues. This concern is unwarranted. The IRAC, for all its strengths, is not a policy-making body and will not become one. No single agency has the authority to ensure that a national vision informs spectrum management and spectrum negotiations. Continued fragmentation and indecision will be the result of a failure to establish a spectrum oversight body in the White House.

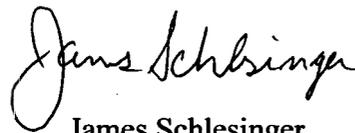
The exercise NTIA has undertaken at the President's request is of crucial importance to the United States. We are increasingly lagging behind other nations in key wireless technologies because of our fragmented approach to spectrum management. This imposes real costs on the economy and on American competitiveness, costs that will grow in the future. Our view is that new technologies hold the promise of unleashing the economic potential of spectrum in the United States, but that our current outmoded management structure stands in their way.

In our role as the co-chairs of the Spectrum Commission, we have met with NTIA Assistant Secretary Gallagher and other Federal officials involved in the spectrum reform effort to discuss the findings of the report. They would be happy to do so again if there are questions or if they can make other contributions to improving spectrum management. Please do not hesitate to contact us if you have questions or require further information on the Commission or the Report.

Sincerely,



Robert Galvin



James Schlesinger

Attachment: "Spectrum Management for the 21st Century."

http://www.ntia.doc.gov/ntiahome/frnotices/2004/SpectrumInitiativeNOI_01282004.doc