

AT&T on the National Spectrum Strategy

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Allocate Sufficient Spectrum to Support the Network of the 21st Century

While there are many competing and important spectrum use cases for both federal and non-federal stakeholders, a successful National Spectrum Strategy must allocate sufficient spectrum resources to ensure the national mobile strategic infrastructure can support expected rapid expansion of mobile service demand

- o **Mobile networks are the network of the 21st century** – Nearly *all* citizens and business, as well as federal stakeholders rely on our national mobile infrastructure to support their connectivity needs. Many citizens, including low-income families, rely solely on their mobile service to meet their connectivity needs.
- o Spectrum is an essential component of these mobile networks – We cannot meet expected demand without access to new spectrum resources in the 4-5 year range and beyond.
- o It is imperative that the U.S. spectrum strategy prioritize spectrum resources to support the expansion of these networks.
- o Failure to do so will put at risk U.S. leadership in the digital economy and a slowdown of the national economy.

Prioritize “Network Grade” Spectrum

A robust National Spectrum Strategy must ensure we allocate sufficient “network grade” spectrum:

- o **Full-power & good propagation (<8.5 GHz)** to enable the rollout of macro-network solutions;
- o **Flexible use** to empower networks to upgrade quickly to more efficient technology solutions;
- o **Licensed** with well defined property rights necessary to unleash capital resources to expand nationwide mobile networks;
- o **Large, continues channel size** to allow for higher data rates and TDD operations; and
- o **Internationally harmonized** to the largest extent possible.

Co-existence with other co-primary stakeholders is possible as long as these “network grade” conditions are met and the rights of co-primary stakeholders are well defined and transparent prior to auction.

Allocating more spectrum to unlicensed and/or low power sharing solutions is not in the public interest

The recently allocated 1.35 GHz of spectrum to unlicensed and low power, non-ubiquitous solutions remains greatly underused. The NSS must not allocate additional scarce resources to these use cases.

Instead, the scale must be balanced by allocating sufficient scarce spectral resources to “network grade” use cases. **The U.S. cannot afford the opportunity cost of failing to do so.**

Allocate at Least 1500 MHz of Network Grade Mid -Band Spectrum

- Short term target: Reallocate and auction, at least 150 MHz in the 3.1 -3.45 GHz range within 4-5 years
- Mid-term target: Reallocate and auction at least 200 MHz in the 4 GHz range and at least 600 MHz above 6 GHz in the next 5-7 years
- Longer-term target: spectrum in the 12/13 GHz range in the next 7 -9

