

April 27, 2023

**Re: *Request for Comments***, Development of a National Spectrum Strategy

**Docket/RM:** NTIA-2023-0003

Dear Assistant Secretary Davidson:

HTTP writes to you regarding the Development of the National Spectrum Strategy. HTTP is the national Latino voice on telecommunications and technology policy. We are a CEO Roundtable of national Latino organizations working to ensure that the full array of technological and telecommunications advancements are available to all Latinos in the United States.

As the NTIA and the United States continue to work on their full spectrum strategy, HTTP urges the NTIA to center their strategies on underrepresented stakeholders while emphasizing how a balanced approach can help create economic opportunity and close the digital divide for marginalized communities. To bring about more equitable economic and digital opportunities, the NTIA should identify additional mid-band spectrum and adopt a balanced allocation process that is compatible with both licensed spectrum and unlicensed and/or shared spectrum use. The NTIA should also urge Congress to promptly restore the Federal Communications Commission's spectrum auctioning authority so that the United States can stay competitive on the global marketplace.

Allocation of more mid-band spectrum will directly help the economic growth of U.S. Latinos. For example, when previous administrations repurposed spectrum bands for full-power commercial wireless licensed use, the allocation resulted in massive U.S. private sector investment and innovation in 4G, the creation of millions of Latino jobs.<sup>1</sup>

HTTP's constituency has one of the largest buying potentials in the world. Latino economic output went from being equivalent to the world's eighth-largest GDP at the start of 2020 to the fifth-largest when the year ended.<sup>2</sup> A more balanced allocation is also important for our communities as out of all surveyed populations, Latinos are the most dependent on smartphone use.<sup>3</sup> Continued auctions and identification of additional spectrum that can be licensed and unlicensed and shared among government, private, and public sectors is important to HTTP and its community. With our diverse communities at the center of these balanced approaches, this will also help provide access to small and minority-owned businesses to access spectrum, and will ensure our constituents are eligible for future economic benefits.

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<sup>1</sup> The 4G Decade: Quantifying the Benefits, Recon Analytics (2020) <https://api.ctia.org/wpcontent/uploads/2020/07/The-4G-Decade.pdf> ("Recon Analytics 4G Decade Report"); see also Letter from FCC Chairwoman Jessica Rosenworcel to Chairwoman Maria Cartwell and Chairwoman Cathy McMorris Rodgers (April 18, 2023)(*arguing that wireless communications lie at the center of the digital economy and continue to spur economic growth, investment, and job creation*).

<sup>2</sup> Shannon Greenwood, For U.S. Latinos, COVID-19 has taken a personal and financial toll Pew Research Center Race & Ethnicity (2022).

<sup>3</sup> Internet/Broadband Fact Sheet, PEW RESEARCH CENTER: INTERNET, SCIENCE & TECH (2023).

As the NTIA develops the National Spectrum Strategy, it should note that the U.S. is experiencing a deficit in full-power commercial licensed spectrum. HTTP finds this concerning as it is forecasted that the U.S. will have a spectrum deficit of 400 megahertz by 2027, compiled in that this deficit will have more than tripled to over 1,400 megahertz by 2032.<sup>4</sup> In order to continue to open the door for economic growth and opportunity among historically forgotten citizens, spectrum policies must continue to move forward and take a balanced approach to these strategies while continuing to include underrepresented stakeholders in these conversations.

HTTP calls on the NTIA and the administration to allocate more mid-band spectrum as it will have systemic wide benefits for U.S. Latinos and continue to access the full array of technological advancements.

Sincerely,  
HTTP

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<sup>4</sup> Coleman Bazelon and Paroma Sanyal, How Much Licensed Spectrum is Needed to Meet Future Demands for Network Capacity?, The Brattle Group, at 3-4, 24 (Apr. 17, 2023) (“Brattle Group April 2023 Report”) [see also https://www.ctia.org/news/how-much-licensed-spectrum-is-needed-to-meet-future-demands-for-network-capacity](https://www.ctia.org/news/how-much-licensed-spectrum-is-needed-to-meet-future-demands-for-network-capacity) (suggesting the potential mechanisms to ease the anticipated spectrum gap).