



April 17, 2023

The Honorable Alan Davidson  
Assistant Secretary of Commerce for Communications and Information  
National Telecommunications and Information Administration, Department of Commerce  
1401 Constitution Ave., NW  
Washington, DC 20230

**Re: Development of a National Spectrum Strategy, Docket No. 230308–0068**

Dear Assistant Secretary Davidson:

As a leading voice for the Lesbian, Gay, Bisexual, and Transgender (LGBTQ+) community, we at LGBT Tech appreciate the opportunity to offer comments on NTIA’s proceeding to help inform the development of a National Spectrum Strategy. LGBT Tech is one of the nation’s premier organizations working to bridge the technology gap for LGBTQ+ individuals. Through our partnerships with tech companies, non-profit groups, policy makers, scholars, and innovators, we’re working to increase inclusion, ensure safety and empower entrepreneurship for LGBTQ+ communities around technology.

Specifically, LGBT Tech supports the pillars set forth in NTIA’s Request For Comment (“RFC”) which proposes to develop its strategy around three core “pillars”. These pillars include developing a spectrum pipeline, long-term spectrum planning coordination with the FCC, and promoting the innovation and the adoption of technologies that expand spectrum capacity and usability.

LGBT Tech has [previously detailed](#) the importance of increasing licensed and unlicensed spectrum for marginalized communities such as the LGBTQ+ community and we support NTIA’s efforts to make more spectrum available to all communities. In today’s digital age, having access to high-speed broadband is essential for LGBTQ+ people to stay informed, connected, and secure. Unfortunately, many LGBTQ+ communities face significant barriers to accessing the broadband spectrum they need. This lack of access can limit the ability of LGBTQ+ individuals to access important resources and services, including critical healthcare, support services, and employment opportunities. Having more spectrum available can help improve the overall quality of broadband services and increase speeds, enabling better access to the internet for everyone, including LGBTQ+ communities. Having access to more broadband spectrum can be particularly important for LGBTQ+ communities due to the unique challenges that they face, including increased risk of discrimination and violence, limited access to health care and support services, and higher rates of poverty. Broadband access can help to level the playing field and makes it easier for LGBTQ+ people to access the resources they need. For example, with access to broadband, LGBTQ+ people can connect with local resources, such as LGBTQ+-friendly health care providers, support groups, and job opportunities. This can be

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especially important for LGBTQ+ youth, who may not have access to these resources in their local communities. By ensuring that all communities have equal access to the same resources, spectrum allocation helps to bridge the digital divide between the haves and have-nots.

We continue to emphasize the need for policymakers to expand the pipeline of new licensed and unlicensed spectrum. Ideally, this will result in making more spectrum available for new licensed spectrum (giving wireless operators the opportunity to build highly secure, interference-free networks) and unlicensed spectrum (providing users low-cost access to airwaves) that jointly can be leveraged to benefit marginalized communities and increase broadband access for all.

Thank you for allowing us the ability to comment on this proceeding. We're hopeful that NTIA continues to consider the LGBTQ+ community's unique perspective on this pressing matter.

Sincerely,



**LGBT Technology Partnership**

Carlos Gutierrez

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