



July 7, 2023

Via E-Mail

Mr. Scott Blake Harris
Senior Spectrum Advisor
National Telecommunications and Information Administration
1401 Constitution Avenue NW
Washington, DC 20230

Re: *Developing and Implementing a National Spectrum Strategy for the United States*,
Docket No. NTIA-2023-0003

Dear Mr. Harris:

On June 30, 2023, CTIA along with representatives from member companies AT&T, T-Mobile, UScellular, and Verizon, met with you and Sean Spivey of NTIA to support the Administration's efforts to identify spectrum to support growing commercial wireless needs.

As CTIA highlighted in comments in this proceeding,¹ Administration leadership is essential to driving a National Spectrum Strategy that enables U.S. commercial wireless interests to maintain the global leadership that is critical to our nation's economic and national security. That includes ensuring new jobs and technological innovations occur here at home. This Administration and Congress have taken significant actions to align U.S. technological capabilities with our national interests,² but there is a gap in spectrum policy. At present, the nation has no plan to provide more licensed commercial access to standard power mid-band spectrum, the foundation of the advanced wireless ecosystem, even as mobile data traffic is expected to grow six-fold in the next ten years and even as China and other nations race ahead to meet that demand.³

¹ See Comments of CTIA, Docket No. NTIA-2023-0003 (filed Apr. 17, 2023), <https://api.ctia.org/wp-content/uploads/2023/04/CTIA-Comments-on-NTIA-National-Spectrum-Strategy-230417.pdf>.

² See, e.g., Kate Dimsdale, *NTIA Promotes 5G Supplier Diversity At Home and Abroad*, NTIA BLOG (June 30, 2023), <https://ntia.gov/blog/2023/ntia-promotes-5g-supplier-diversity-home-and-abroad>.

³ See, e.g., *China allows 6GHz spectrum for 5G, 6G systems*, XINHUA NEWS AGENCY (June 27, 2023), <https://english.news.cn/20230627/5c9944b83f6c4d948a3c7da8d62ecb02/c.html>.



CTIA urged quick, decisive action to identify at least 1,500 megahertz of mid-band spectrum for licensed commercial wide-area wireless use, including in the 3 GHz, 4 GHz, and 7/8 GHz bands, and to further explore opportunities in low-band spectrum as well. We need commercial, full-power licensing models that have been proven to facilitate nationwide deployments—not low-power, preemptible access frameworks that will not meet our nation’s broadband deployment and national security goals.⁴ It is in our national interest to participate in global spectrum harmonization—rather than having the U.S. on a spectrum island—to assure robust and secure connectivity here and abroad.

We appreciate NTIA’s focus on delivering a National Spectrum Strategy and Implementation Plan that will achieve these important domestic interests and we look forward to continued collaboration with the Administration to achieve these outcomes.

Sincerely,

/s/ Thomas C. Power

Thomas C. Power

Sr. Vice President and General Counsel

⁴ See CTIA Response to NTIA Report, *An Analysis of Aggregate Citizens Broadband Radio Service Spectrum Access System Data from April 2021 to January 2023* (filed May 31, 2023), https://api.ctia.org/wp-content/uploads/2023/06/230531-CTIA-Comments-on-NTIA-CBRS-Data-Report.Final_.pdf.