

July 20, 2023

Mr. Scott Blake Harris
Director, National Spectrum Strategy
National Telecommunications and Information Administration
U.S. Department of Commerce
1401 Constitution Avenue NW
Washington, DC 20230

Re: Development of a National Spectrum Strategy; Docket No. NTIA-2023-0003

Dear Mr. Harris,

On July 11, 2023, Tim Donovan, Maribeth Collins, Alexandra Mays, and I of Competitive Carriers Association (“CCA”), along with CCA Board Chair Mark Nazé, Strategic Projects Officer, Nsight; CCA Board Members Slayton Stewart, Carolina West Wireless and Mike Johnson, Appalachian Wireless; and CCA member representatives Jeff Blum, DISH Network; Holly Henderson, Southern Linc; and Howard Sears, NextGen; met with you, Derek Khlopin, Sean Spivey, Chris Mattingly, and Jonathan Stefaniak about the National Telecommunications and Information Administration’s (NTIA) ongoing efforts to develop a National Spectrum Strategy.

CCA applauded NTIA’s work to develop a National Spectrum Strategy and discussed ways to promote U.S. competitiveness and spectrum access throughout the country, specifically in rural America. Many of CCA’s members are small carriers committed to delivering service to unserved and underserved populations, and NTIA has a valuable opportunity to promote policies that will facilitate rural broadband deployment.

Consistent with its comments filed on April 17, 2023, CCA emphasized the importance of a strong and stable long-term spectrum pipeline in the United States. Including sufficient licensed, mid-band spectrum in the pipeline is key to U.S. innovation and competitiveness and is important to meeting ever-increasing consumer demands for wireless connectivity. Mobile service enabled by licensed mid-band spectrum has proven especially important in rural areas, where closing the digital divide represents both a challenge and an opportunity to unlock economic growth. In addition to discussing CCA’s comments in the National Spectrum Strategy proceeding, participants had more detailed conversation on the following issues:

Ensuring Spectrum Access for Small and Rural Carriers


CCA emphasized the unique needs and circumstances of rural wireless carriers that present challenges to deploying service in their networks. For example, small carriers do not drive economies of scale in the wireless network and device markets, and therefore rely on large carriers to develop technology and devices. A National Spectrum Strategy that enhances global spectrum coordination will make more technology available to small carriers that cannot shape supply chains to meet their unique needs and provide additional options for their consumers that might not otherwise exist.

Participants also discussed the importance of spectrum auction procedures that help to extend wireless deployment in areas that might otherwise be overlooked. CCA has long advocated for spectrum aggregation limits, narrowed channel sizes, and smaller geographic area licenses in FCC-led spectrum auctions. Participants noted that auctions with larger geographic area licenses, such as by cellular market areas (CMAs), have harmed small carriers and rural wireless deployment. CMAs contain a large metropolitan area as well as surrounding rural areas. Large carriers tend to win those licenses and focus on serving the metropolitan areas, leaving spectrum in the rural portions of the license areas unused. Because of the large license sizes, rural carriers who are most incentivized and eager to maximize use of spectrum in rural areas are effectively shut out. In recent spectrum auctions, the FCC has adopted procedures that benefit smaller carriers, including adopting smaller geographic license areas. In its National Spectrum Strategy, CCA encourages NTIA to reinforce these efforts and note their importance for maximizing spectrum use in rural America.

Spectrum Sharing

While CCA believes that spectrum is most effectively utilized on a licensed and exclusive-use basis, in some bands, spectrum-sharing may be necessary. CCA urged NTIA to consider some of the lessons learned with recent dynamic spectrum-sharing arrangements when developing the National Spectrum Strategy. Specifically, CCA members discussed their experiences and challenges with spectrum sharing in the Citizens Broadband Radio Service band (“CBRS”) (3550-3700 MHz) and the 6 GHz Automatic Frequency Coordination (“AFC”) regime.

For example, CBRS offered access to critical mid-band spectrum, and many CCA members were awarded licenses. In practice, however, the model has demonstrated certain weaknesses, including the lack of an effective framework to mitigate interference between users, which has led to inconsistencies in performance. CCA members also discussed challenges associated with differences in quality among the Spectrum Access Systems (SASs) that coordinate sharing in the band. Lastly, low-power limitations result in potentially inefficient use of the band. Because of these challenges, some carriers have opted to halt deployment of their CBRS spectrum. CBRS presents a missed opportunity to utilize critical mid-band spectrum as efficiently as possible. CCA and several CBRS licensees have urged consideration of higher-power levels and other solutions like standardizing uplink and downlink ratios in the band to increase the band’s utility.



CCA members emphasized that, in any sharing model, users must have the ability to use the spectrum and have clarity about the impacts of sharing. More real-world testing of sharing frameworks being developed, including smaller carriers, would potentially be more informative and helpful than reliance on modelling as the primary basis for advancing new sharing models. More rigorous vetting would also ensure more efficient use of scarce spectrum resources.

CCA appreciates the opportunity to speak with you and your team to share the insights and unique experiences of small and rural carriers in providing wireless service throughout the country. CCA members share NTIA's goal of maximizing spectrum use to promote the country's economic and security policy objectives and looks forward to continuing towards that goal with NTIA in the coming years.

Sincerely,

/s/ Angela Simpson

Angela Simpson
Senior Vice President & General Counsel
asimpson@ccamobile.org
(202) 747-0711

cc: Derek Khlopin
Chris Mattingly
Sean Spivey
Jonathan Stefaniak