

April 27, 2020

Chairman Ajit Pai
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Commissioner Michael O’Rielly
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Commissioner Jessica Rosenworcel
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Commissioner Brendan Carr
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Commissioner Geoffrey Starks
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

RE: Unlicensed White Space Device Operations in the Television Bands (ET Docket No. 20-36; FCC 20-17; FRS 16585)

Dear Chairman Pai, Commissioner O’Rielly, Commissioner Rosenworcel, Commissioner Carr, and Commissioner Starks,

The undersigned organizations, representing millions of taxpayers, write to you in support of the Federal Communications Commission’s (FCC) notice of proposed rulemaking (NRPM) published in the April 3, 2020 Federal Register, “to provide additional opportunities for unlicensed white space devices operating in the broadcast television bands (TV Bands) to deliver wireless broadband services in rural areas and applications associated with the Internet of Things (IOT).”¹

The impact COVID-19 has had in the United States is a reminder of the importance of broadband access. Schools are moving online, telemedicine has grown in importance, and video meetings are keeping family and friends connected during a time of quarantine and social distancing. Adoption of the final rules will make TVWS part of the solution and improve the country’s resiliency in times of crisis by bringing more Americans online.

The proposed rule will increase and improve broadband access, particularly in rural areas, by updating how TVWS can be utilized. The proposal would allow “higher transmission power and higher antennas for fixed white space devices in rural areas,”² and provide for narrowband IOT applications like precision agriculture and connected vehicles, including school buses and tractors, all of which are important to closing the digital divide. Approximately 30 million Americans cannot access broadband, and only 65 percent of Americans in rural areas can access reliable and fast internet service.³

¹ Federal Communications Commission, 47 CFR Part 15, [ET Docket No. 20-36; FCC 20-17; FRS 16585] Unlicensed White Space Device Operations in the Television Bands, *Federal Register*, Vol. 85, No. 65, April 3, 2020, <https://www.govinfo.gov/content/pkg/FR-2020-04-03/pdf/2020-06569.pdf>.

² Federal Communications Commission, “Chairman Pai Proposes Updating TV White Space Rules to Expand Connectivity for Rural Americans,” Press Release, February 5, 2020, <https://docs.fcc.gov/public/attachments/DOC-362311A1.pdf>.

³ Federal Communications Commission, FCC Initiatives, Bridging The Digital Divide, <https://www.fcc.gov/about-fcc/fcc-initiatives/bridging-digital-divide-all-americans>.

Increasingly, daily life requires reliable internet access, including paying bills, buying goods and services, completing homework assignments, and telehealth. The proposed TVWS rule is a leap forward for those whose lives will be improved by this technology, and we urge its adoption before the end of 2020. By doing so, the FCC will help bring dependable broadband to more Americans, particularly in rural areas.

Sincerely,

Thomas Schatz
President
Citizens Against Government Waste

Steve Pociask
President/CEO
The American Consumer Institute

Sarah Anderson
Director of Policy
FreedomWorks

Phil Kerpen
President
American Commitment

Tom Struble
Technology & Innovation Policy Manager
R Street Institute

Curt Levey
President
The Committee for Justice

David Williams
President
Taxpayers Protection Alliance

Zach Graves
Head of Policy
Lincoln Networks

Karen Kerrigan
President and CEO
Small Business & Entrepreneurship Council

Bartlett Cleland
Executive Director
Innovation Economy Institute

Wayne T. Brough, Ph.D.
President
Innovation Defense Foundation