

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of)
)
Facilitating Shared Use in the 3.1-3.55 GHz Band) WT Docket No. 19-348

**COMMENTS OF THE
COMPUTING TECHNOLOGY INDUSTRY ASSOCIATION
(COMPTIA)**

The Computing Technology Industry Association (“CompTIA”),¹ the leading association for the global information technology (“IT”) industry, respectfully submits these comments in response to the Notice of Proposed Rulemaking (“NPRM”)² in the above-captioned proceeding.

I. THE COMMISSION SHOULD CONTINUE MOVING AGGRESSIVELY TO MAKE MID-BAND SPECTRUM AVAILABLE FOR COMMERCIAL WIRELESS APPLICATIONS.

CompTIA appreciates the Commission’s focus on making more spectrum available for commercial wireless applications. As the Commission well knows, mid-band spectrum remains particularly valuable for both current and future wireless technologies due to its ability to support higher data rates than lower-band spectrum, and longer propagation distances than high-band spectrum. We appreciate that the Commission has taken significant steps in recent years to address high-band spectrum through the Spectrum Frontiers proceeding, and to address low-band spectrum through the TV broadcast incentive auction, among other steps. In the middle bands,

¹ CompTIA supports policies that enable the information technology industry to thrive in the global marketplace. We work to promote investment and innovation, market access, robust cybersecurity solutions, commonsense privacy policies, streamlined procurement, and a skilled IT workforce. Visit www.comptia.org to learn more.

² Notice of Proposed Rulemaking, *Facilitating Shared Use in the 3.1-3.55 GHz Band*, WT Docket No. 19-348, [FCC 19-130](http://www.fcc.gov/record/2019/12/19-130) (Dec. 2019) (“NPRM”).

the agency is taking important steps to transition a portion of the C-Band spectrum, and the Citizens Broadband Radio Service (“CBRS”) in the 3.5 GHz band is now coming to market after years of work.

However, while these steps are highly commendable, they also demonstrate the significant challenges – and the lengthy time-to-market – needed to clear spectrum, and mid-band spectrum in particular. Meanwhile, global competitors continue to press ahead, as other countries have made more mid-band spectrum available than the United States.³ It is therefore essential for the U.S. to keep pace to maintain leadership in technology as the 5G era dawns.

II. THE 3100-3550 MHZ BAND IS A PARTICULARLY IMPORTANT BAND FOR COMMERCIAL WIRELESS APPLICATIONS AND THE ICT INDUSTRY.

The Commission is right to sunset non-federal allocations in the lower 3 GHz band. The 3.1-3.5 GHz band represents an important opportunity to make more mid-band spectrum available. In addition to the basic benefits of mid-band spectrum described above, the 3.3-3.55 GHz portion of the band is *globally harmonized*.⁴ Global harmonization of spectrum allocations brings numerous benefits, including a broader ecosystem for technology and engineering expertise, reduced device complexity and cost, increased battery life, global interconnection and roaming, potential for interoperability, and economies of scale for device manufacturers.⁵

³ See, e.g., Analysys Mason, *Global Race to 5G – Spectrum and Infrastructure Plans and Priorities*, Apr. 2018, https://api.ctia.org/wp-content/uploads/2018/04/Analysys-Mason-Global-Race-To-5G_2018.pdf.

⁴ NPRM ¶ 8.

⁵ See, e.g., [Report and Order and Further Notice of Proposed Rulemaking, Use of Spectrum Bands Above 24 GHz for Mobile Radio Services, et al.](#), FCC 16-89, GN Docket No. 14-177, at ¶ 389 (2016) (“Spectrum Frontiers R&O”) (recognizing benefits of harmonization).

In addition, given the Commission's active efforts to clear 280 MHz of spectrum at the lower end of the C-Band from 3700-3980 MHz,⁶ creating a path for more commercial wireless operations between 3100 and 3550 MHz band would represent progress toward eventually permitting commercial access to a large, continuous band from 3100 to 3980 MHz. Since a single radio could potentially operate across that entire band, such continuous access could potentially lead to greater interoperability and service reliability, and reduced costs. It could also potentially lead to the development of wider-band technologies beyond those currently envisioned.

III. THE COMMISSION SHOULD CONTINUE WORKING WITH NTIA TO ENABLE COMMERCIAL WIRELESS OPERATIONS IN THE ENTIRE LOWER 3 GHZ BAND.

NTIA recently completed a study of the 3450-3550 MHz band, concluding that time-based sharing between federal incumbents and commercial wireless operations holds significant promise.⁷ We agree, and since that portion of the band is globally harmonized, it should be the agency's top priority. However, the Commission should also work with NTIA to identify creative solutions for the entire 3100-3550 MHz band. Recent history has demonstrated that initial claims by federal agencies that a certain band is unsuitable for commercial use can sometimes change over time, whether due to reassessments or technological developments. For example, in the case of CBRS, the large size of the initial exclusion zones would have made it difficult to economically deploy viable services in the band, but further study and efforts by

⁶ See, e.g., [Report and Order and Order of Proposed Modification \(circulation draft\), Expanding Flexible Use of the 3.7 to 4.2 GHz Band](#), GN Docket No. 18-122 (Feb. 2020) ("C-Band Draft Order").

⁷ NTIA, *Technical Feasibility of Sharing Federal Spectrum with Future Commercial Operations in the 3450-3550 MHz Band*, Tech. Rpt. 20-546, Jan. 27, 2020, <https://www.ntia.doc.gov/report/2020/technical-feasibility-sharing-federal-spectrum-future-commercial-operations-3450-3550>.

NTIA, DoD, and others eventually led to a significant reduction in the size of the zones.⁸ The same may be true here, and we encourage the Commission and NTIA to continue working collaboratively with other agencies to enable more productive use of the entire 3.1-3.55 GHz band.

IV. THE COMMISSION SHOULD SUPPORT EFFORTS TO IMPROVE SPECTRUM MANAGEMENT ACROSS THE GOVERNMENT.

The President’s FY21 budget recently proposed a very significant \$25 million increase in funding – from \$7 million to \$32 million – to NTIA’s budget specifically for the purpose of domestic spectrum management.⁹ As the Department of Commerce’s budget submission explains:

The current [30-year-old] systems are inadequate to execute NTIA’s spectrum functions in a timely manner and limits NTIA’s ability to accommodate advanced technologies, such as deploying 5G, advancing space commerce, and securing government missions by investing in its spectrum management IT infrastructure. With these resources, NTIA will create a secure, flexible, and automated spectrum management with the key outcomes of an enterprise architecture; provide a secure system environment; improve the integrity and confidentiality of data; enable cross-domain capabilities; develop advanced analytical tools; reduce “white space” between spectrum assignments; reengineer business processes; and automate workflows.¹⁰

CompTIA strongly supports this proposal, and we encourage the Commission to lend its vocal support for this plan as well. Investment in NTIA’s spectrum management functions will greatly

⁸ [Report and Order and Second Further Notice of Proposed Rulemaking, Amendment of the Commission’s Rules with Regard to Commercial Operations in the 3550-3650 MHz Band](#), FCC 15-47, GN Docket No. 12-354, at ¶ 3 (“CBRS Report and Order”) (explaining that after further review, NTIA was able to reduce the size of the geographic exclusion zones by approximately 77 percent).

⁹ Department of Commerce, *Budget in Brief: Fiscal Year 2021*, at 131 (Feb. 2020), https://www.commerce.gov/sites/default/files/2020-02/FY_2021_DOC_BiB-021020.pdf.

¹⁰ *Id.*

aid the Commission's work – likely including this very proceeding – and the eventual return to American taxpayers from the proposed budget increase will be a hundredfold at the very least.

CONCLUSION

CompTIA greatly appreciates the Commission's ongoing work to make additional mid-band spectrum available, and we look forward to working with the Commission on these issues.

Sincerely,

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