



November 05, 2024

VIA ECFS

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
45 L Street, NE
Washington, DC 20554

Re: *Promoting Investment in the 3550-3700 MHz Band, GN Docket No. 17-258*

Dear Ms. Dortch

The Multicultural Media, Telecom and Internet Council (MMTC) has consistently advocated for a balanced spectrum policy that enables all players in the broadband ecosystem to thrive in today's digital economy. Our communities have faced challenges related to the digital divide—whether it is low broadband adoption among multicultural communities, lack of connectivity for critical anchor institutions, empowering small businesses and schools to deploy their own wireless networks, or ensuring digital technologies are accessible to vulnerable families and at-risk youth.

Achieving digital equity remains our primary goal. While we are encouraged by the progress made in broadband adoption, there is still much work to be done to ensure digital inclusion nationwide. As the Federal Communications Commission (FCC) seeks comment on ways to improve or refine the Citizens Broadband Radio Service (CBRS), it is essential that the needs of our communities are represented and that we collaborate with policymakers to advance positive change. CBRS, with its critical mid-band spectrum and innovative sharing model, has enabled a diverse range of participants to access this essential resource in new and innovative ways. As the Commission considers what changes to CBRS may be appropriate, we urge you to do “no harm” and consider the profound impact that this spectrum has already had—and can continue to have—on promoting digital inclusion and innovation.

By leveraging mid-band spectrum with a dynamic sharing regime, CBRS has opened the door for a wide range of participants, from large wireless providers to small local operators and new market entrants while at the same time preserving important incumbent government national security operations in the band. This inclusive approach has ensured that spectrum resources are not dominated by a few, but are instead accessible to many, thereby creating a level playing field, increasing competition for wireless services, and unleashing important innovation.

CBRS is already reducing network congestion, improving service quality, and enabling the deployment of private LTE networks, notably in schools, libraries, and other anchor institutions. These networks are not just improving educational outcomes, but they are also increasing competition and efficiency by empowering new wireless network owners and connecting communities that have long been on the wrong side of the digital divide. For instance, schools and libraries in rural and underserved areas can now offer reliable, high-speed internet at a fraction of the cost, enhancing learning opportunities and supporting economic development.

Moreover, CBRS is driving innovation across various sectors. In manufacturing, it is improving efficiency and safety through enhanced connectivity. In urban planning, it is enabling the integration of smart technologies in airports, sports stadiums, and city infrastructures. Communications providers are deploying CBRS to compete with long-standing wireless providers and bolster the cost efficiencies in their wired and wireless networks. The Internet of Things (IoT) solutions powered by CBRS are not only making cities smarter but also more resilient and sustainable. The potential use cases are endless, and they all contribute to greater economic opportunities, competition, and improved quality of life for communities nationwide.

The CBRS spectrum sharing model allows for harmonious coexistence among a diverse set of users, including federal agencies like the Department of Defense, commercial operators, and community anchor institutions. This coexistence is made possible through careful spectrum management that prevents interference and ensures that all users can operate efficiently within the same spectrum band. At its core, the CBRS rules and technical limits facilitate coexistence of multiple operators through carefully defined operating areas and calibrated power levels to avoid interference among services. As the CBRS ecosystem evolves, it is important to carefully consider any proposed changes to the rules that users relied on to launch their services. For instance, while increases in allowed power levels could expand coverage for some operators, such changes must be evaluated to ensure they do not lead to significant increases in interference or reduce the overall number of operators able to effectively use the CBRS band. Any modifications should seek to preserve the benefits that CBRS has brought to consumers and communities, while exploring the opportunities for enhanced utilization of the spectrum.

While evaluating how a service might be improved is laudable, we strongly encourage the FCC to ensure that any changes it adopts will still preserve the core elements of the CBRS framework, which has proven to be a powerful tool for digital inclusion and economic innovation. Any significant changes that threaten the integrity of this model would not only set back the progress made but also hinder future advancements in broadband access and service quality. CBRS is more than just a spectrum-sharing model; it is a critical component of our nation's digital infrastructure that supports competition, innovation, and equity. We urge the FCC to continue supporting this innovative approach and to refrain from enacting policies that could disrupt its success.

Respectfully,



Robert E. Branson
President and CEO



Kenley Joseph
Tech and Telecom Policy Counsel