



February 5, 2025

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) respectfully submits this letter in the above-referenced docket to reiterate and expand upon the key concerns we raised during the comment round of this proceeding regarding the NPRM proposals to modify key aspects of the Citizen Broadband Radio Service (CBRS) framework.

MMTC is a non-partisan, non-profit, and market-oriented advocacy organization that seeks to preserve and expand minority ownership and equal opportunity in the media and telecommunications industries, and to close the digital divide. MMTC works with key stakeholders in public, private, and community sectors, blending public policy reform and social justice advocacy to ensure that communications policy reflects the nuanced issues of 21st century civil rights.

We have consistently advocated for a balanced U.S. spectrum policy that encourages and facilitates competition, innovation and diverse ownership of spectrum assets to meet the needs of a changing population. In our prior filing in this proceeding, we emphasized the importance doing “no harm” with any changes currently being considered. .

As the Commission itself acknowledges in the NPRM, CBRS remains the only band where a sharing model enables licensed non-federal users and federal operators to coexist within the same geographic areas, and that framework has been successful.¹

¹ See Promoting Investment in the 3550-3700 MHz band, Notice of Proposed Rulemaking and Declaratory Ruling ¶ 3, GN Docket 17-58, (“NPRM”) rel. August 16, 2024; citing NTIA, Commerce Spectrum Management Advisory Committee: Report of Subcommittee on CBRS, at 5, 6, 9, 17, https://www.ntia.gov/sites/default/files/2023-12/cbrs_subcommittee_final_report.pdf (Dec. 19, 2023) (CSMAC CBRS Report)

The General Authorized Access (GAA) tier has added significant value to our economy by promoting local economic development and supporting businesses and institutions investing in underserved communities.² Coming a short five years after the 3.45 GHz deployment³, the Commission should be mindful as to not harm small, minority, and women-owned businesses, WISPs and other broadband providers in rural and tribal areas and non-profit users seeking direct local access for private networks. As we have previously recommended, the Commission should avoid changes that:

- Disrupt the delicate balance of technical parameters that enable the growth of diverse new services without harming vital national security incumbent systems.
- Undermine the core elements of the CBRS framework, which ensure the broadest range of uses and applications possible and prevent the need to recreate a similar structure.
- Lead to significant increases in interference or reduce the overall number of operators and applications able to effectively use the CBRS band.
- Harm the benefits that CBRS has brought to consumers and communities.

Moreover, the FCC should avoid policies that could inadvertently create greater barriers to entry or increase market concentration, which would harm the competitive landscape and reduce opportunities for minority and small business participation.

The CBRS framework has been a remarkable success story, fostering innovation and deployment by a wide range of users, including community anchor institutions, who are leveraging the band to address unique community needs.⁴

The CBRS band's shared spectrum model has proven its value as a catalyst for innovation and economic growth. Any technical changes should be considered with great caution to avoid jeopardizing the vibrant ecosystem of users and applications it has fostered.

We urge the Commission to preserve the elements that have made the CBRS band a success. Noting the objections raised by the Schools Health & Libraries Broadband (SHLB) Coalition that proposals to raise power levels or out-of-band emissions could undermine this success by reducing access and limiting the ability of operators to deploy innovative applications, MMTC strongly encourages the Commission to work closely with associations and stakeholders to avoid "disrupting the careful balance of technical parameters that underpin the CBRS framework."⁵

We stand ready to provide any additional information or support that may assist in these deliberations.

² The forthcoming deployment funding under the Broadband Equity, Access, and Deployment (BEAD) program aims to achieve full coverage across the country. Cost-effective solutions such as fixed wireless access (FWA) in expensive-to-serve areas increase the likelihood of meeting this goal. Preserving the current CBRS framework could enhance program success, addressing a broader range of connectivity needs.

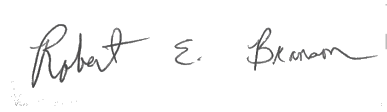
³ Auction of Priority Access Licenses in the 3550-3650 MHz Band Closes, Public Notice, 35 FCC Rcd 9287 (2020)

⁴ See Comments of Public Interest Spectrum Coalition, NPRM (Nov. 6, 2024) ("PISC Comments").

⁵ See, Letter from SHLB, to Marlene H. Dortch, Secretary, FCC, GN Docket No. 17-258 (December 19, 2024) ("SHLB Letter").

Thank you for your attention to this important matter.

Yours Truly,

A handwritten signature in black ink that reads "Robert E. Branson". The signature is written in a cursive style with a vertical line at the end.

Robert Branson, Esq.
President and CEO

Kenley Joseph

Kenley Joseph
Tech and Telecom Policy Counsel