

March 1, 2024

The Honorable Alan Davidson  
Assistant Secretary of Commerce for Communications and Information  
National Telecommunications and Information Administration (NTIA)  
U.S. Department of Commerce  
1401 Constitution Ave., NW  
Washington, DC 20230

Dear Administrator Davidson:

We, a coalition of U.S. commercial spectrum users, public interest stakeholders, and aerospace and defense companies, write to commend the Biden Administration for its release of the National Spectrum Strategy (NSS) and to provide recommendations on how to structure the forthcoming Implementation Plan to prime the pump for success. The NSS promises to be a pivotal step towards ensuring that American consumers, innovators, industries and national security interests all have access to essential spectrum resources they need. As underscored by the NSS, the economic vitality, technological leadership, and security of our nation are intrinsically tied to the effective management and continued innovative use of spectrum.

However, the path to realizing these commendable goals requires pragmatic progress that aligns with the accelerating demands for connectivity and innovation and the need to ensure that national security technologies can meet existing and emerging threats. Promoting meaningful, near-term, and localized, access to additional spectrum bands can significantly promote competition among a diversity of users and providers in the wireless market. The extensive prior study of several of the spectrum bands laid out in the NSS facilitates such near-term access. Missing the opportunity to leverage that work, however, would risk a protracted process that could stifle the very innovation and competitive access to spectrum and the advancement of national security that the NSS aims to promote.

As the National Telecommunications and Information Administration (NTIA) conducts its work under the NSS, the need for an open and transparent process with speed in decision-making and implementation cannot be overstated. The decisions made following the NSS will directly affect the nation's ability to maintain and promote our global competitiveness, national security, and national security technology leadership with our allies. To this end, we urge the NTIA to adopt an Implementation Plan that is aggressive in expanding the pie for a wide variety of public, commercial, and national security uses. This should entail accelerating the development and adoption of innovative spectrum sharing technologies that not only meet the immediate and future needs of Americans and the goal of advancing our national security technology leadership. The potential of spectrum coexistence frameworks to revolutionize access and efficiency in spectrum use is immense, and their promotion should be central to NTIA's efforts. These frameworks are already proving quite successful in the 6 GHz band for unlicensed use and within the Citizens Broadband Radio Service in the 3.5 GHz Band for shared licensed use.

Moreover, NTIA's approach must firmly support the extension of America's global leadership in innovation – in both commercial wireless and national security technologies. Any moves that align with spectrum allocation rules advocated by adversaries, under the pretense of “global harmonization,” would undermine our national interests and global standing. Further, alignment of national security systems with U.S. allies remains critical to maximizing integration and interoperability, and the harmonization advocated by our geopolitical adversaries would undermine that alignment. U.S. policy and market dynamics are unique, and our spectrum policy must reflect this uniqueness, preserving our self-determination and comparative advantages in the global arena. What's more, the U.S. should seek to set global policy, not follow the lead of others. Of course, there will be times when the People's Republic of China's underlying goals in spectrum policy and those of the U.S. are the same, but a narrow perspective focusing solely on global harmonization for consumer wireless may not appropriately serve the nation's collective goals and national interests.

The calls for such harmonization by mobile network operators are often led by assertions of licensed spectrum scarcity that call for drastic measures to further centralize control over the airwaves, sidelining the benefits of innovative and decentralized sharing models in which the U.S. is a global leader. NTIA's plan must recognize these claims for what they are: a partial perspective that could inadvertently delay the deployment of critical communications and undermine national security technologies. It is particularly concerning that strategies like relocating incumbent users could result in protracted delays particularly in the cases of the Lower 3 GHz and 7 GHz bands. In those frequencies, transitions could exceed a decade, and the ultimate feasibility of clearing or compressing federal use in those bands is questionable, given the lack of comparable spectrum, estimated costs, and serious disruption to the armed forces. Such long delays are untenable and would deny consumers access to much-needed spectrum while undermining other vital commercial and government interests that could be served through shared, licensed, unlicensed, and hybrid frameworks.

We appreciate your consideration of these points. We stand ready to collaborate with the NTIA and other stakeholders to refine and expedite the implementation of the NSS. Together, we can forge a future where spectrum management supports robust economic growth, innovation, and security, benefiting all Americans and asserting our leadership on the global stage.

Sincerely,

American Library Association  
Charter Communications  
Comcast Corporation  
Cox Communications  
Dynamic Spectrum Alliance (DSA)  
Federated Wireless  
Deere & Company  
Lockheed Martin Corporation  
NCTA – The Internet & Television Association  
Open Technology Institute  
Public Knowledge

RTX Corporation  
Midcontinent Communications  
Schools, Health & Libraries Broadband (SHLB) Coalition  
Spectrum for the Future  
WifiForward  
Wireless Internet Service Providers Association