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May 7, 2021

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

Re: Expanding Flexible Use of the 12.2-12.7 GHz Band (WT Docket No. 20-443); 86 FR 20111

Dear Ms. Dortch:

The U.S. Chamber Technology Engagement Center (“Chamber” or “C_TEC”) welcomes the opportunity to provide comment to the Federal Communications Commission (“FCC” or “Commission”) on proposed changes to use of the 12.2-12.7 GHz band (“Band”).¹

It is vital that the federal government implement a comprehensive, unified, national spectrum management strategy to reduce the scarcity of spectrum and enhance the availability and flexibility in licensing and allocating licensed spectrum. Such a strategy should rely on market forces to determine the most efficient and effective uses for commercial spectrum, at the same time providing for other uses of spectrum in the public interest. A strategy that gets spectrum policy right will be in the public interest to ensure All Americans are connected and will promote equity.

Currently, millions of Americans are subscribed to and rely upon Direct Broadband Satellite (“DBS”) services that utilize the Band. These DBS services enable Americans, particularly in remote areas, the ability to view live news and entertainment.

Additionally, there is significant promise that non-geostationary orbit (“NGSO”) systems, which also occupy the band, to provide broadband service. If

¹ 86 Fed. Reg. 13266 (March 8, 2021).

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these NGSO systems are able to meet their potential, satellite broadband systems will be instrumental in complementing wireline and wireless technologies in fully closing the Digital Divide in which at least 14.5 million Americans lack access to high-speed broadband.

The Chamber urges the FCC to consider that the current DBS and NGSO uses of the Band are vital to ensuring all Americans are connected to the 21st century digital economy and it is in the public interest that these uses be protected against harmful interference.

Thank you for the opportunity to participate in this proceeding and if you have any follow up questions, I may be reached at (202) 463-5632 or by e-mail at jcrenshaw@uschamber.com.

Sincerely,

A handwritten signature in cursive script that reads "Jordan Crenshaw".

Jordan Crenshaw
Executive Director & Policy Counsel
Chamber Technology Engagement Center