

March 25, 2019

The Honorable Roger Wicker  
Chairman, Committee on Commerce, Science & Transportation  
United States Senate  
512 Dirksen Senate Building  
Washington, DC 20510

The Honorable Frank Pallone, Jr.  
Chairman, Energy & Commerce Committee  
United States House of Representatives  
2125 Rayburn House Office Building  
Washington, DC 20515

The Honorable Ajit Pai  
Chairman, Federal Communications Commission  
445 12th Street, S.W.  
Washington, DC 20554

Dear Chairmen Wicker, Pallone, and Pai:

Extending fixed and mobile broadband services to all Americans are key national priorities. The below signatories represent a wide variety of organizations and associations that in turn represent the providers that serve the most rural and sparsely populated areas of this country (the “Rural Representatives”). These providers are investing in the infrastructure necessary to deploy robust broadband throughout rural America and are keenly interested in the opportunities presented by the potential reallocation of C-Band spectrum (3.7-4.2 GHz).

The Rural Representatives urge law and policy makers to consider how proceeds from a C-Band auction could ease the transition to terrestrial use and help deploy broadband throughout the nation. A C-Band auction is expected to generate tens of billions of dollars.<sup>1</sup> Congress could direct the Commission to set aside a significant portion of the auction proceeds to support the deployment and sustainability of both fixed and mobile broadband infrastructure.

The Rural Representatives would also encourage the Commission to bring this valuable spectrum to market in a manner that benefits the widest variety of stakeholders. The rules should balance the competing needs of interested parties and offer meaningful opportunities for providers of all kinds and sizes to offer spectrum-based services to rural consumers. The Commission, rather than a private entity should therefore oversee the transition of this valuable spectrum resource to terrestrial use.

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<sup>1</sup> [Bloomberg, 12/24/18](#).

Letter to Congressional Leaders  
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It is essential that any changes to the spectrum licensing rules fully protect incumbent users and consumers from harmful interference, service loss and disruptions. Many providers use the C-Band for important or critical communications. The band is an essential tool in the arsenal of several providers serving rural and remote areas. Any introduction of terrestrial use in the band must ensure these current uses continue (or transition where economic and feasible) uninterrupted.

There is much concern among those most vested in serving rural areas that a transfer of the spectrum via an unprecedented private market transaction will lack the transparency, expediency, fairness and necessary oversight of an FCC-led auction – and thus ultimately lead to a spectrum transfer to the largest, most well-financed mobile wireless providers. For more than two decades, policymakers have consistently recognized that a properly structured Commission-led auction provides the most efficient and effective mechanism for assigning spectrum licenses, and with appropriate protections avoids excessive concentrations of spectrum in the hands of a few providers that could leave rural consumers without access to spectrum-based services.<sup>2</sup> The Rural Representatives urge Congress and the Commission to develop laws and rules that ensure a smooth transition to terrestrial use and an assignment of licenses via a Commission-led spectrum auction.

A Commission-led auction of cleared C-Band spectrum and thoughtful consideration of the appropriate use of the proceeds to help support widespread deployment of broadband infrastructure will confer extraordinary benefits to the American people. The undersigned look forward to working with Congress, the FCC and the industry to ensure that C-Band spectrum is made available to a diverse array of stakeholders and that next-generation services are deployed quickly, competitively and ubiquitously.

Sincerely,

*The Undersigned Rural Representatives*

*NTCA - The Rural Broadband Association*

*National Rural Electric Cooperative Association*

*Rural Wireless Association*

*The League of Rural Voters*

*National Organization of Black County Officials*

*Michigan Broadband Cooperative*

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<sup>2</sup> See, 47 USC § 309(j)

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*Fredericksburg Area Chamber of Commerce*

*Kentucky Rural Health Association*

*Indiana Small and Rural Schools  
Association*

cc:

Senator Maria Cantwell  
Ranking Member, Committee on Commerce, Science & Transportation

Representative Greg Walden  
Ranking Member, Energy and Commerce Committee

The Honorable Michael O'Rielly  
The Honorable Brendan Carr  
The Honorable Jessica Rosenworcel  
The Honorable Geoffrey Starks  
Commissioners, Federal Communications Commission