



ENSURING US LEADERSHIP IN 5G

October 7, 2021

VIA ECFS

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

Re: Written *Ex Parte* Communication, Expanding Flexible Use of the 12-12.7 GHz Band, WT Docket No. 20-443

Dear Ms. Dortch:

The record assembled in response to the Commission's [Notice of Proposed Rulemaking](#) on how to maximize efficient use of the 12.2-12.7 GHz band ("12 GHz band")¹ confirms broad support for opening up the band for terrestrial 5G without the need for a re-auction.

As the 5Gfor12GHz Coalition², we recognize that Congress is on the cusp of advancing H.R. 3684³ ("The Bipartisan Infrastructure Bill"), and with it \$65 billion in funding targeted at expanding America's broadband connectivity, closing the digital divide, and ensuring American innovation and leadership. As this legislation moves through Congress, it is imperative that the Commission readies its spectrum resources and network positioning to quickly turn these allocated funds into real, accessible, and high-speed Internet connections for unserved and underserved Americans – especially those in rural and urban areas.

The FCC can take action now – without waiting on the legislative process – to open up 500 megahertz of contiguous spectrum ideal for accelerating the 5G mobile and wireless networks, improving opportunistic access to spectrum, and strengthening the capacity of Wi-Fi and other unlicensed services. The Rulemaking – to expand the 12 GHz band for two-way terrestrial services – has already gone through the public notice and comment period, with ample opportunity for parties to weigh in and share data. The record before the Commission is clear, including a statistically robust simulation of likely NGSO 5G deployments based on real-world

¹ *Expanding Flexible Use of the 12.2-12.7 GHz Band*, Notice of Proposed Rulemaking, 36 FCC Rcd. 606 (2021).

² The members of the 5Gfor12GHz Coalition include: Airspan, AltioStar, AtLink, Cambridge Broadband Networks Group Ltd. (CBNG), Computer & Communications Industry Association (CCIA), Center for Education Innovations (CEI), Center For Rural Strategies, Dell Inc., DISH Network, Etheric Networks, Federated Wireless, GeoLinks, Globtel, Go Long Wireless, Granite Net, INCOMPAS, Mavenir, MMWave Tech, MVD Number 53 Partners LLC, NextLink, Open Technology Institute at New America Foundation, Public Knowledge, Resound, Rise Broadband, RS Access, LLC, Rural Wireless Association, Tilson Tech, VMware, WeLink, White Cloud Technologies, Xiber, The X-Lab at Pennsylvania State University.

³ Infrastructure Investment and Jobs Act, H.R. 3684, 117th Cong. (2021), available at <https://www.congress.gov/bill/117th-congress/house-bill/3684/text>.

operating parameters and data conducted by RKF Engineering Solutions, LLC.⁴ The relevant Bureaus should now work to review the technical data and make recommendations to the Commissioners on a way forward.

The Bipartisan Infrastructure Bill represents a shared commitment from both parties in Congress and the Administration to investing in America’s digital future. By moving forward with this Rulemaking, the Commission can match that commitment to next-generation broadband infrastructure by putting critical spectrum resources – like the 12 GHz band – to their highest use without delay.

Respectfully submitted,

The 5Gfor12GHz Coalition:

Airspan
AltioStar
AtLink
Cambridge Broadband Networks Group Ltd. (CBNG)
Computer & Communications Industry Association (CCIA)
Center for Education Innovations (CEI)
Center For Rural Strategies
Dell Inc.
DISH Network
Etheric Networks
Federated Wireless
GeoLinks
Globtel
Go Long Wireless
Granite Net
INCOMPAS

Mavenir
MMWave Tech
MVD Number 53 Partners LLC
NextLink
Open Technology Institute at New America Foundation
Public Knowledge
Resound
Rise Broadband
RS Access, LLC
Rural Wireless Association
Tilson Tech
VMware
WeLink
White Cloud Technologies
Xiber
The X-Lab at Pennsylvania State University

⁴ Comments of RS Access, LLC, WT Docket No. 20-443, GN Docket No. 17-183, App. A (filed May 7, 2021) (attaching RKF Engineering Solutions, LLC, Assessment of Feasibility of Coexistence between NGSO FSS Earth Stations and 5G Operations in the 12.2-12.7 GHz Band conducted in May 2021).