June 26, 2013

The Telecommunications Industry Association (TIA), the leading trade association for global manufacturers, vendors, and suppliers of information and communications technology, wishes to thank you for holding a hearing this week to examine federal spectrum issues. TIA is strongly supportive of congressional and regulatory efforts to enable wireless broadband services in bands currently used for federal purposes. As the Communications Subcommittee prepares to discuss these issues, we urge you to consider the following:

Transition of Federal Bands

TIA supports the clearing of re-purposed federal spectrum bands to the maximum extent feasible. Cleared, exclusively licensed spectrum bands allow for the most efficient and dependable use of spectrum suitable for mobile broadband deployment, and maximize network investment, marketability, availability and consumer use.

In spectrum bands that cannot be cleared for exclusive licensed use, the most promising forms of sharing by mobile broadband networks, including those based on LTE technology, are licensed sharing with geographic, frequency or time-based coordination, including exclusion zones. Spectrum sharing, whether based on sensing technology or the FCC’s Part 15 unlicensed rules, presents technical challenges when required of certain technologies, including LTE.

June 14 Presidential Memorandum

TIA supports the President’s recent actions to improve the efficiency of federal spectrum use and to facilitate the use of this spectrum for commercial purposes. Additional public-private sharing of information on current spectrum uses, consideration of spectrum efficiency in procurements, and the targeting of research funding towards spectrum-related initiatives all represent meaningful steps forward to improve the efficiency of the nation’s spectrum use over the long term.

Transparency

Although the Presidential memorandum facilitates significant progress, we urge you to continue pressing federal stakeholders for additional transparency regarding existing uses of federal spectrum. Congress should provide support for a federal spectrum audit or similar policies to assist NTIA in its responsibilities regarding federal spectrum management. A comprehensive inventory of federal spectrum
use would facilitate the development of processes that would ensure that limited spectrum resources are allocated more efficiently – whether to governmental or commercial purposes.

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TIA appreciates the efforts of the Administration, Congress, the FCC, and others in helping to satisfy the demand for spectrum caused by the exponential growth of mobile broadband services. We urge you to continue your efforts in the months ahead to improve the nation’s management of its spectrum resources.

For more information, please contact Danielle Coffey at (703)-907-7734 or by email at dcoffey@tiaonline.org. TIA once again thanks you for your work on these important issues, and we look forward to continued progress in 2013 and beyond.

Sincerely,

Grant E. Seiffert
President