



May 30, 2013

The Honorable Mark Pryor
Subcommittee on Communications,
Technology, and the Internet
255 Dirksen Senate Office Building
Washington, DC 20510

The Honorable Roger Wicker
Subcommittee on Communications,
Technology, and the Internet
555 Dirksen Senate Office Building
Washington, DC 20510

Dear Chairman Pryor and Ranking Member Wicker:

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 next week to examine the State of Wireless Communications. TIA is strongly supportive of congressional and regulatory efforts to expand wireless broadband services. In doing so, we urge you to focus on the following areas:

Voluntary Incentive Auctions

Ensuring Prompt Action. The Senate Communications Subcommittee should continue to conduct oversight of the FCC to ensure that the voluntary incentive auction of television broadcast spectrum be conducted by the end of 2014. Speedy action by the FCC is necessary simply to keep pace with the exploding demand for commercial wireless services.

Maximizing Licensed Spectrum. The FCC should develop a spectrum “re-packing” plan that maximizes the amount of spectrum available at auction for licensed mobile services. In doing so, the FCC must abide by Congress’ mandate that guard bands be minimized so that they are no larger than is technically reasonable to prevent harmful interference between licensed services.

Simplifying Auction Rules. The reverse auction rules should be as simple as possible to attract the greatest possible number of broadcast participants. The FCC should offer existing licensees an attractive financial incentive for facilitating the clearing of spectrum, since the spectrum law gives the agency only one chance to “get this right.”

Allowing Broad Participation. The success of the incentive auction ultimately hinges on the participation of all possible bidders in the forward auction. The FCC should not limit the eligibility of participants, and the rules should also provide for the earliest possible repacking / reclaiming of the broadcast spectrum. This is essential to ensure a successful auction that will raise sufficient funds for the deployment of a nationwide interoperable public safety broadband network – a network that will itself harness the benefits of advanced wireless communications for first responders and other public officials.

Identifying Additional Spectrum

Unlicensed Spectrum. TIA supports further development of unlicensed spectrum applications in various other bands, such as the internationally-harmonized 2.4 GHz and 5 GHz bands. Congress should

encourage the FCC to build upon its January 2013 announcement to open 195 MHz of additional spectrum for unlicensed use in the 5350-5470 MHz and 5850-5925 MHz bands.

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.

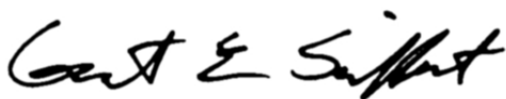
In spectrum bands that cannot be cleared for exclusive licensed use, the most promising forms of sharing by mobile broadband networks, including those based on LTE technology, are licensed sharing with geographic, frequency or time-based coordination, including exclusion zones. Spectrum sharing, whether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

Transparency. TIA also urges Congress to continue pressing federal stakeholders for additional transparency regarding existing uses of federal spectrum. At a recent Senate oversight hearing, FCC commissioners showed bipartisan 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.

TIA appreciates the efforts of Congress, NTIA, 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,

A handwritten signature in black ink, appearing to read "Grant E. Seiffert". The signature is written in a cursive, flowing style.

Grant E. Seiffert
President