

October 26, 2020

The Honorable Mark Meadows  
Chief of Staff  
The White House  
1600 Pennsylvania Avenue  
Washington, DC 20500

Dear Mr. Meadows:

Wi-Fi is at the core of Americans' lives. We use it in our homes to connect our phones, laptops, televisions, and more devices every day. We use it at work, connecting small and large businesses to customers, linking workforces, and bringing manufacturers, ports, and warehouses the latest technologies. We use it to study and learn, connecting teachers to parents and students and to infinite online resources. All of this is even more important today as Americans engage, learn, and work remotely over their Wi-Fi connections. This success depends on Wi-Fi having adequate spectrum resources, governed by pro-investment, pro-growth rules. As broadband service providers deliver gigabit speeds to homes and businesses, and more of our lives involve wireless connections to the Internet, the country needs more capacity for Wi-Fi.

Thankfully, Chairman Pai and his FCC colleagues have proposed to open part of the 5.9 GHz spectrum band to power Wi-Fi's future success. The FCC has proposed to expand the country's existing primary Wi-Fi band into the 5.9 GHz band, creating a widely usable 160-megahertz Wi-Fi channel that will leverage the existing and diverse Wi-Fi ecosystem to deliver remarkable gigabit speeds to Americans. And their solution can be implemented quickly.

Today, the 75 megahertz of spectrum in the 5.9 GHz band are mostly unused in the vast majority of the country. In 1999, the FCC gave the automotive industry full use of the band, for free, to deploy Intelligent Transportation Systems (ITS). For the next 20 years, the auto industry talked about deploying a technology called "Dedicated Short Range Communications" (DSRC) that would deliver safety and commercial applications in "talking cars." But as the FCC has recognized, DSRC failed, and the automotive industry in the same time period turned to other technologies better suited to delivering vehicle safety applications, like blind-spot detection, drowsiness detection, automatic braking, and more that can be seen in almost any new car today. Auto companies never commercially deployed DSRC as they promised they would, and now we have only a handful of unsustainable government-subsidized pilot projects that have cost taxpayers almost \$50,000 per radio on the road today.

Chairman Pai therefore has proposed a reasonable compromise to make gigabit Wi-Fi available to Americans in the near term while still leaving the automotive industry sufficient spectrum to deliver on their promises of safety using ITS technologies. The upper 30 megahertz of the band will be used for automotive safety applications, while the lower 45 megahertz of the band can be used for Wi-Fi. This spectrum can also be used for fixed wireless services to connect more

Americans to broadband. This plan offers a win-win and a fertile ground for all technologies to flourish.

Those 45 megahertz of 5.9 GHz spectrum can make an almost-immediate difference for better, faster, higher-capacity Wi-Fi because the band is directly adjacent to existing 5 GHz unlicensed spectrum. This band supports Wi-Fi for millions of consumer devices and critical functions like medical telemetry, airport operations, container ports, railway monitoring and logistics, and the industrial Internet of Things networks used in manufacturing and retail fulfillment. That means the country's existing infrastructure can quickly and affordably be upgraded – in some cases with as little as a software upgrade – to deliver next-generation capacity and speeds to businesses and consumers across the country.

In the same 20 years that DSRC has languished, demand for Wi-Fi spectrum has exploded. Wi-Fi already carries a majority of Internet traffic in the United States and contributes hundreds of millions of dollars to the U.S. economy annually. And industry experts expect those figures to continue increasing; for example, Cisco estimates that as much as 70 percent of 5G mobile traffic will be offloaded to Wi-Fi.

The FCC took an important step this year to allow unlicensed operations to share access to the 6 GHz band, which will open expansive bandwidth to unleash the next generation of Wi-Fi and unlicensed innovation. While the 6 GHz band holds significant promise for the future, it will take time to develop and deploy the equipment necessary to use it on a shared unlicensed basis. Further, the FCC imposed strict limitations on Wi-Fi operating in the 6 GHz band in order to protect important incumbent operations, including limiting indoor-only Wi-Fi to power levels that can limit coverage and, for outdoor use cases, requiring devices to be controlled by a yet-to-be-developed Automated Frequency Coordination system. To be clear, the 6 GHz band alone will not satisfy the critical and growing needs of unlicensed operations in the marketplace.

The 5.9 GHz band is an essential addition to the new, shared 6 GHz band because it will create a unique, gigabit-capable channel that can be activated by as early as the end of this year. The band's compatibility with existing Wi-Fi devices gives providers a head-start for upgrading the consumer experience. That means that, with the right rules in place this year, consumers will be able to experience gigabit Wi-Fi capabilities in their homes in a matter of months.

The FCC proved how quickly the 5.9 GHz band can improve the lives of Americans when it granted more than 100 fixed wireless Internet service providers (WISPs) temporary access to 5.9 GHz spectrum to meet growing network demands brought on by the COVID-19 pandemic.<sup>1</sup> WISPs were incredibly successful in quickly putting the 5.9 GHz to work for the communities they serve, particularly in rural and suburban communities. For instance, Nextlink of Hudson Oaks, Texas connected 2,000 rural Texans to upgraded plans and found “tremendous success moving its gear to the 5.9 GHz band where it has operated with much less interference.” The temporary grant in the band safeguarded vital community functions and ensured Americans

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<sup>1</sup> [“5.9 GHz Band Boosts Consumer Internet Access During Covid-19 Pandemic.”](#) (May 4, 2020).

coast-to-coast were not left behind during this time of surging home and community broadband use. The need for temporary unlicensed use of 45 megahertz of spectrum in the 5.9 GHz band was so important that 78 members of the Wireless Internet Service Providers Association have signed on to this letter. Now's our chance to convert that temporary improvement into a full-time success story for the whole country.

As Americans continue to work, learn, access healthcare, and conduct most of their lives from a distance, efforts to enhance their Wi-Fi experience are incredibly timely. The FCC's 5.9 GHz compromise proposal is the best near-term solution to meet consumers' growing connectivity needs and serve as a bridge and critical complement to the expanded new 6 GHz Wi-Fi ecosystem.

We ask that you encourage the FCC to move forward quickly to adopt its groundbreaking compromise proposal for the 5.9 GHz band and unleash next-generation gigabit Wi-Fi as soon as possible.

Respectfully submitted,

360 Communications, Inc.  
Acadiana Wireless  
Access Humboldt  
Advanced Internet Service Provider  
Advanced Wireless  
Advantenon  
Air Advantage  
Air Link Internet Services  
ALLvanza  
Alsaf Wireless  
Alyrica Networks, Inc.  
Amplex Internet  
Aristotle Unified Communications  
AU Wireless  
Benton Institute for Broadband & Society  
Black Mesa Wireless  
Blip Networks  
Bolt Internet  
Bridgenet Communications  
Broadband Corp  
Broadband VI  
BSpeedy Wireless  
Cal.net, Inc.  
Celerity Networks LLC

Center for Individual Freedom (CFIF)  
Cherry Capital Connection, LLC  
CMS Internet LLC  
Community Internet Providers  
Consortium for School Networking (CoSN)  
Consumer Action for a Strong Economy (CASE)  
Eastern Carolina Broadband LLC  
Elevated Networks  
Engine  
Fourway Computer Products  
GigaBeam Networks, LLC  
GlobalVision  
Grand County Internet Services  
GTEK Communications  
Hankins Internet Technology  
InfoWest  
Innovation and Prosperity Policy Institute  
Innovation Economic Institute  
Institute for Liberty  
Institute for Policy Innovation  
Intermax Networks  
Internet Service, Inc.  
L.R. Communications

Lakeland Internet LLC  
LAN Communications Corp  
Less Government  
LGBT Tech  
Linux Internet LLC  
McMinnville Access Company d/b/a  
OnlineNW & XS Media  
MetaLINK  
Mimbres Communications  
Montana Internet Corporation  
New Era Broadband, LLC  
New Lisbon Broadband and  
Communications  
New Wave Net Corps.  
OACYS Technology  
Open Technology Institute at New America  
PennWisp, LLC  
Portative Technologies, LLC  
Public Knowledge  
Quantum Telecommunications, Inc.  
R Street Institute  
Rapid Systems  
Razzo Link, Inc.  
REACH4 Communications  
Resonance Broadband LLC  
RGC Wireless  
Ridge Wireless  
Rise Broadband  
River Valley Internet, LLC  
Router12 Networks LLC  
Safelink Internet  
SDWISP  
SignalNet Broadband, Inc.  
Simply Bits  
Slopeside Internet  
SmartBurst LLC  
Smarter Broadband  
Softcom Internet  
Southern Ohio Communication Services,  
Inc.  
Taxpayers Protection Alliance (TPA)  
TCCSkywire NW, Inc. d/b/a Netafy  
TecInfo Communications  
TekWave

Tnet Broadband Internet, LLC  
Triad Wireless  
Twin Wireless Internet  
Wave Wireless  
West Michigan Wireless ISP  
Wireless Internet Service Providers  
Association (WISPA)  
Ziplink Systems  
ZIRKEL Wireless