

Becky Tangren
Vice President & Associate General Counsel
o (202) 222-2459 e btangren@ncta.com

August 10, 2023

Via E-Mail

Mr. Scott Blake Harris
Senior Spectrum Advisor National Telecommunications and Information Administration
1401 Constitution Avenue NW Washington, DC 20230

Re: Developing and Implementing a National Spectrum Strategy for the United States, Docket No. NTIA-2023-0003

Dear Mr. Harris:

On August 2, 2023, NCTA along with representatives from member companies Comcast, Charter, and Cox, met with you, Derek Khlopin, Sean Spivey, and Jonathan Stefaniak of the National Telecommunications and Information Administration (NTIA) to support the Administration's efforts to develop and implement a comprehensive National Spectrum Strategy (NSS).

As NCTA highlighted in comments in this proceeding,¹ NCTA supports a diverse spectrum pipeline, especially as greenfield spectrum grows scarcer, and American consumers and businesses increasingly rely on unlicensed and shared-licensed spectrum to connect and deliver essential services across the country.

NCTA emphasized that a diverse spectrum policy requires a spectrum-strategy document that recognizes the multitude of spectrum use cases and the ability for such diversity to drive American competitiveness. Americans' needs have evolved beyond simple blanket coverage based on massive license areas and high-power levels. Instead, consumers and businesses need targeted coverage that enables them to meet their unique needs for connectivity.

NCTA also stressed that megahertz-to-megahertz comparisons do not accurately portray the U.S. spectrum landscape. A NSS that explicitly advances alternatives to exclusive licensing will promote competition and U.S. technology and economic leadership. Furthering the growth of technologies like Wi-Fi and sharing techniques, an area where the U.S. is a leader, will foster American competitiveness. Finally, the NSS should account for existing efforts by stakeholders to enable commercial new

¹ See Comments of NCTA, Docket No. NTIA-2023-0003 (filed Apr. 17, 2023), <https://www.regulations.gov/comment/NTIA-2023-0003-0097>.

commercial wireless services, such as forthcoming Partnering to Advance Trusted and Holistic Spectrum Solutions (PATHSS).

NCTA commends the Administration's efforts in developing a document that has the potential to drive U.S. leadership through its spectrum policy and we look forward to continuing to work with NTIA as the NSS progresses.

Sincerely,

/s/

Becky Tangren