



April 17, 2023

Alan Davidson
Assistant Secretary of Commerce for Communications and Information
National Telecommunications and Information Administration
1401 Constitution Ave. NW
Washington, DC 20230

Re: *Development of a National Spectrum Strategy*

Docket No. 2023–0003
Submitted via Regulations.gov

Dear Assistant Secretary Davidson:

The National Urban League (NUL) submits this letter in response to the Request for Comments on the *Development of a National Spectrum Strategy* on behalf of our 92 affiliates that serve over 300 communities in 36 states and the District of Columbia. As a historic civil rights organization that advocates on behalf of and provides direct services to a diverse constituency in the core areas of workforce, housing, health, education, and social justice, we believe it is critical that the National Telecommunications and Information Administration (NTIA) creates a National Spectrum Strategy that prioritizes digital equity, access to economic opportunities for communities of color, and diverse stakeholder engagement.

Spectrum is utilized in a variety of ways ranging from smart cities to public safety to wearable technologies, but it has also increasingly become critical for wireless connectivity. According to Pew Research Center, Black, Latino/e, and low-income households use smartphones to connect to the internet more than home broadband.¹ Mobile connectivity provides opportunities for these communities to stay connected to family and friends both domestically and abroad, access telehealth, and engage in distance learning or job training on the go. Further, mobile devices and related applications have become a critical tool for documenting injustices such as police brutality, organizing for social justice, and enhancing civic engagement. As the use of wireless broadband continues to increase, it is imperative that additional spectrum is allocated to meet those urgent needs. Further, our National Spectrum Strategy must include a focus on digital equity and ensuring communities of color and low-income communities are not further marginalized as new products and services are deployed. As recent reports have noted, spectrum policies could either impede or facilitate digital equity and innovation by communities of color.²

To that end, it is necessary for our National Spectrum Strategy to acknowledge that equity does not stop with ensuring that communities have access to wireless services or next generation technologies. As we stated in our *Lewis Latimer Plan for Digital Equity and Inclusion*, equity in technology and

¹ *Mobile Technology and Home Broadband 2021*, Pew Research Center (June 3, 2021), <https://www.pewresearch.org/internet/2021/06/03/mobile-technology-and-home-broadband-2021/>.

² *Toward a National Spectrum Strategy*, Aspen Digital (September 15, 2022), <https://www.aspeninstitute.org/publications/toward-a-national-spectrum-strategy/>; *Back to the Spectrum Future: The 20th Anniversary of the Spectrum Policy Task Force*, Public Knowledge (January 2023), <https://publicknowledge.org/policy/back-to-the-spectrum-future-the-20th-anniversary-of-the-spectrum-policy-task-force/>.



technology-enabled sectors must also include access to economic opportunities.³ For example, a substantial number of resources are needed for research and development to advance next generation spectrum management. These R&D opportunities must also be extended to researchers who serve communities of color such as those from Historically Black Colleges and Universities (HBCUs), which are responsible for graduating a significant percentage of Black students with STEM degrees.⁴ R&D funding as it relates to the development of a National Spectrum Strategy and adjacent funding opportunities available through the *CHIPS and Science Act* and the *Infrastructure Investment and Jobs Act* could not only have a great impact on those institutions but also in fueling the economy of other industries in the surrounding communities, particularly businesses owned by Black entrepreneurs and other entrepreneurs of color. Because HBCUs are largely concentrated in the Black rural south, this sort of investment could be transformative in those local economies. There must be a strategy that provides a path for minority-owned businesses to access spectrum for economic gain. Similarly, there must be strategies to develop a skilled and diverse workforce to occupy jobs in spectrum-reliant sectors. A National Spectrum Strategy that fails to properly plan for equity efforts will inevitably further marginalize already marginalized communities not only as consumers but also as workers and entrepreneurs.

Lastly, spectrum policies, both through regulations and personnel, have historically excluded communities of color. Far too many assumptions are made about what stakeholders should and are interested in participating in spectrum policy debates, which allows those already flushed with resources to have immense power in what policies are implemented. As NUL and the broader civil rights community have previously stated, diverse stakeholder engagement is central to creating equitable and inclusive telecommunications and technology policies.⁵

As NTIA leads the path in creating a National Spectrum Strategy, the needs of communities of color must be prioritized. These efforts should be viewed as interconnected with the ability for our communities to thrive as it relates to access to and adoption of technology as well as economic opportunities provided through the technology sector. Please contact Alisa Valentin, Senior Director of Technology and Telecommunications Policy at the National Urban League, at avalentin@nul.org with any additional questions.

Sincerely,

A handwritten signature in black ink, appearing to read "m h morial".

Marc H. Morial
President and CEO
National Urban League

³ *The Lewis Latimer Plan for Digital Equity and Inclusion*, National Urban League (March 30, 2021), <https://nul.org/program/lewis-latimer-plan>.

⁴ *Cultivating a Growing Need for STEM Expertise*, United Negro College Fund (February 23, 2023), <https://unconf.org/the-latest/cultivating-a-growing-need-for-stem-expertise>.

⁵ The Leadership Conference on Civil and Human Rights, *Infrastructure Investment and Jobs Act Implementation Comments*, Docket No. 220105-00 (February 4, 2022), <https://civilrights.org/resource/infrastructure-investment-and-jobs-act-implementation-docket-no-220105-0002/>.