



April 17, 2023

Stephanie Wiener  
Acting Chief Counsel  
National Telecommunications and Information Administration  
Washington, DC 20230

Via E-Filing ([www.regulations.gov](http://www.regulations.gov))

**RE: NTIA-2023-0003, Docket 230308-0068, *Development of a National Spectrum Strategy***

Dear Acting Chief Counsel Stephanie Wiener:

On behalf of the Small Business & Entrepreneurship Council (SBE Council), I am pleased to respond to the National Telecommunications Information Administration's (NTIA) Request for Comment on the Development of a National Spectrum Strategy (NSS).

SBE Council is an advocacy, research and education organization dedicated to protecting small business and promoting entrepreneurship. Small businesses dominate every sector of the U.S. economy, which means their viability and growth is vital to quality job creation, innovation, and competition. SBE Council has long supported a robust pipeline of spectrum in order to meet the online connectivity needs of our nation and the innovative waves of technological advancements that are bringing local communities and entrepreneurs more exciting tools and platforms to connect via the internet, the benefits of 5G, and new opportunities that are emerging and await via Web3. The availability of spectrum is key to driving investment, innovation, and the various and new ways that small businesses and local communities will access the digital economy, especially for rural America.

Each successive generation of wireless technology has delivered these new waves of innovation through its downstream effects. Small businesses and entrepreneurs across the country are now utilizing the security and reliability of 5G to participate and compete in the digital economy. More spectrum will be needed to connect more communities and to provide equitable and affordable access to the next wave of technologies.

We applaud NTIA for looking into this critical issue. The initial 1500 MHz NTIA has designated for repurposing is a good start, but again more is needed. A steady, ongoing pipeline of new spectrum suitable for commercial use is key to continue to power American innovation and our small businesses that drive our economy.

Further, a national spectrum strategy should consider the role that licensed, unlicensed and shared spectrum plays. A truly balanced strategy is paramount. We have made significant strides in recent years by allocating over 1200 MHz of unlicensed spectrum in the 6 GHz band<sup>1</sup>. Immediate attention is needed to ensure that we have a sufficient pipeline of licensed spectrum for exclusive, full power use in conjunction with additional unlicensed spectrum allocations.

Again, spectrum is the lifeblood of the next wave of consumer technologies. We are already seeing the benefits of the investments made in 5G with new technologies like fixed wireless access (FWA), also known as 5G Home. 5G home internet can help small businesses reach new customers and expand their market reach, as the access to high-speed, low-latency broadband enables the use of e-commerce and online marketing strategies. By providing small businesses with fast, reliable internet connectivity, fixed wireless access, using licensed spectrum, can help to drive innovation and growth throughout the economy.

A steady supply of licensed and unlicensed spectrum, in combination with shared spectrum where feasible, will help deliver on the promise of next generation wireless technology for small businesses and entrepreneurs across the country. Developing a comprehensive national spectrum strategy is key to ensuring this future. We applaud NTIA's efforts to quarterback our nation's spectrum resources, and we urge the agency to continue to assert its authority to establish a reliable, ongoing process for bringing federal spectrum bands to market.

Sincerely,



Karen Kerrigan  
President and CEO

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***Protecting Small Business, Promoting Entrepreneurship***

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<sup>1</sup>ET Docket 18-295, *Unlicensed Use of the 6 GHz Band*, Report and Order, 35 FCC Rcd 3852 (5) (April 23, 2020)