



May 4, 2020

Marlene Dortch, Secretary  
Federal Communications Commission  
445 12th Street SW  
Washington, DC 20554

Re: Unlicensed White Space Device Operations in the Television Bands, ET Docket No. 20-36

Dear Ms. Dortch,

We write to commend the Commission for its ongoing commitment to expanding broadband connectivity in unserved and underserved rural communities and to thank the Commission for continuing to deliver on this commitment by adopting the Notice of Proposed Rulemaking (NPRM) on TV white spaces (TVWS) put forward by Chairman Pai.

By continuing to support a hybrid network approach, that leverages traditional technologies like fiber alongside innovative solutions like TVWS, we can reduce the cost of bridging the digital divide by as much as 80 percent. Reducing costs and increasing the pace of deployments are critical for the millions of Americans stuck on the wrong side of the digital divide.

That is why Connect Americans Now (CAN), and the 35 organizations co-signed on this letter, applaud the Commission's leadership to clear regulatory barriers to rural broadband innovation by adopting the NPRM on TVWS.

CAN is a coalition of more than 200 organizations and companies representing voices for agriculture, health care, education, small business, technology, veterans, rural advocacy and more — committed to completely eliminating the digital divide in rural America by supporting a mixed-technology approach that leverages the full potential of hybrid network deployments.

An all-of-the-above approach that clears regulatory barriers to innovation and maximizes spectrum resources will help more farmers realize the promise of precision agriculture tools, help more seniors and patients take advantage of telemedicine solutions, reduce the impact of the homework gap that leaves too many rural students behind and increase economic opportunity in thousands of communities.

Updated TVWS rules will enhance the pace, scale and cost-effectiveness of hybrid network broadband deployments in rural areas in several important ways. Specifically, new rules will permit higher transmit power and higher antennas for fixed white space devices in rural areas, permit higher power mobile operations within geofenced areas and allow for the development of new Internet of Things-based services. Revised rules will also permit higher power operations in the first adjacent channel to broadcasters and stipulate mechanisms to prevent interference with existing broadcasters while maximizing the use of TVWS technology for broadband deployments.

This rulemaking will unleash the full potential of TV white space technology as a critical tool to help bridge the digital divide.

We applaud Chairman Pai for his leadership on this rulemaking and respectfully encourage the Commission to move promptly to implement new rules in 2020 in order to swiftly clear regulatory barriers to TVWS and maximize available spectrum resources to eliminate the rural broadband gap.

Thank you for your consideration and your continued dedication to eliminating the digital divide.

Sincerely,

American Telemedicine Association  
Bridge Grange #730  
Chehalem Valley Chamber of Commerce  
City of Athena, Oregon



Connect Americans Now  
Connected Nation  
Consortium for School Networking (CoSN)  
Colorado Nursery and Greenhouse Association  
Eastern Oregon Telecom  
Economic Development Association of North Dakota  
Greater Eastern Oregon Development Corporation  
National Grange  
National Veteran Small Business Coalition  
Nevada Farm Bureau Federation  
North Wasco County People's Utility District  
Northwoods Association of Realtors  
OCHIN  
Oregon Association of Nurseries  
Oregon Cattlemen's Association  
Oregon Dairy Farmers Association  
Oregon Economic Development Association  
Oregon Hop Growers Association  
Oregon State Grange  
Oregon Water Resources Congress  
Perdue University Center for Regional Development  
Spiral Communications  
South Dakota Farm Bureau Federation  
Student Veterans of America  
Technology Association of Oregon  
Teleco Systems  
Telehealth Alliance of Oregon  
Washington Farm Bureau Federation  
Wisconsin Manufacturers & Commerce (WMC)  
Wisconsin Potato & Vegetable Growers Association  
Wisconsin Rural Schools Alliance  
Wisconsin Technology Council

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