



October 20, 2020

Chairman Ajit Pai
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

The Honorable Michael O'Rielly
FCC Commissioner
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

The Honorable Brendan Carr
FCC Commissioner
Federal Communications Commission

445 12th Street, SW
Washington, DC 20554

The Honorable Jessica Rosenworcel
FCC Commissioner
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

The Honorable Geoffrey Starks
FCC Commissioner
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 Chairman Pai, Commissioner O'Rielly, Commissioner Carr, Commissioner Rosenworcel and Commissioner Starks:

We commend the members of the Federal Communications Commission (FCC) for your shared commitment to expanding broadband connectivity in unserved and underserved communities, particularly by maximizing spectrum resources and clearing regulatory barriers to innovation. We write to endorse the Commission's draft Report and Order regarding Unlicensed White Space Device Operations in the Television Bands. We support the adoption of this order during the Commission's next open meeting on October 27, 2020, along with adjustments to further enhance the benefit of white space technology (TVWS) as a tool to help bridge the digital divide and support IoT and precision agriculture innovation¹.

In today's technology-driven world, broadband has become a basic necessity. Like water and electricity, it is one of the essential tools to run an effective farming and ranching operation, open up markets for American products and businesses to compete globally, deliver effective health care services, allow students to reach their full potential and provide veterans the services and opportunities they deserve.

For the millions of Americans who lack access to a broadband connection, the pandemic has exacerbated the many challenges associated with the digital divide and made more urgent solutions to maximize the potential of every tool at the nation's disposal, including TVWS.

That is why Connect Americans Now (CAN), and the 41 organizations co-signed on this letter, welcome the Commission's leadership to clear regulatory barriers to TVWS and strongly encourage the adoption of the draft Report that will help reduce costs and increase the reach of hybrid network broadband deployments.

¹ Microsoft Corporation Ex Parte, ET Docket No. 20-36 (filed October 13, 2020)



Connect Americans Now (CAN) is a coalition of 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.

The proposed revisions to the Commission’s rules on this matter 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.

We applaud the Commission for its dedication to eliminating the digital divide and respectfully encourage the Commission to adopt the Report and Order on TVWS on October 27, 2020 to swiftly clear regulatory barriers to TVWS and maximize available spectrum resources to eliminate the broadband gap.

Thank you for your consideration on this important matter.

Sincerely,

National Companies, Organizations

Archer-Daniels-Midland (ADM)
BASF
BroadbandNow
Connect Americans Now
Connected Nation
Consortium for School Networking (CoSN)
Corteva
Digital Wish
Gigabit Libraries Network
National Cattlemen’s Beef Association
National Cotton Council
National Grange of the Order of Patrons of Husbandry
National Rural Education Association
National Veteran Small Business Coalition
Schools, Health & Libraries Broadband Coalition (SHLB)
USA Rice Federation

Regional/State Companies, Organizations

AllGo
California Farm Bureau Federation
Chehalem Valley Chamber of Commerce
Eastern Oregon Telecom
Economic Development Association of North Dakota
Mississippi Restaurant and Hospitality Association
Montana Rural Education Association
Nevada Farm Bureau
North Clackamas Chamber of Commerce
Northern Wasco County PUD
Oregon Association of Nurseries
Oregon Hop Growers Association
Oregon Dairy Farmers Association
Oregon Economic Development Association
Oregon State Chamber of Commerce
Oregon State Grange
Technology Association of Oregon
Teleco Systems
Telehealth Alliance of Oregon
Tillamook Bay Community College
Thomas County Economic Development Association
Washington Farm Bureau Federation
Wisconsin Corn Growers
Wisconsin Independent Businesses
Wisconsin Rural Schools Alliance (WiRSA)
Wisconsin Technology Council