

February 5, 2025

The Honorable Brendan Carr
Chairman
Federal Communications Commission
45 L Street, NE
Washington, D.C. 20230

Dear Chairman Carr,

The United States has long maintained our leadership in economic and technological innovation by ensuring broad access to one of our most valuable resources: spectrum. Cementing America's position as a global leader in wireless communications depends on maintaining a spectrum policy that is innovative and adaptable and enables quick commercialization. A flexible policy that supports access for a wide range of users ensures that technology can evolve to meet the needs of consumers and enterprises alike.

The Citizens Broadband Radio Service (CBRS) exemplifies this approach, with its innovative spectrum-sharing framework driving the proliferation of private and rural broadband networks. CBRS has enabled low-barrier access to spectrum tailored to specific use cases, empowering U.S. industries to deploy advanced technologies such as 5G and IoT and ensuring global competitiveness.

Unfortunately, recent advocacy by a few parties to alter CBRS rules threatens to undermine this carefully constructed framework, jeopardizing the large number of CBRS deployments and wide range of use cases, including rural broadband, competitive mobile services, manufacturing, industrial and enterprise private networks, transportation and logistics connectivity (e.g. airports and shipping terminals), school and library access, and more.

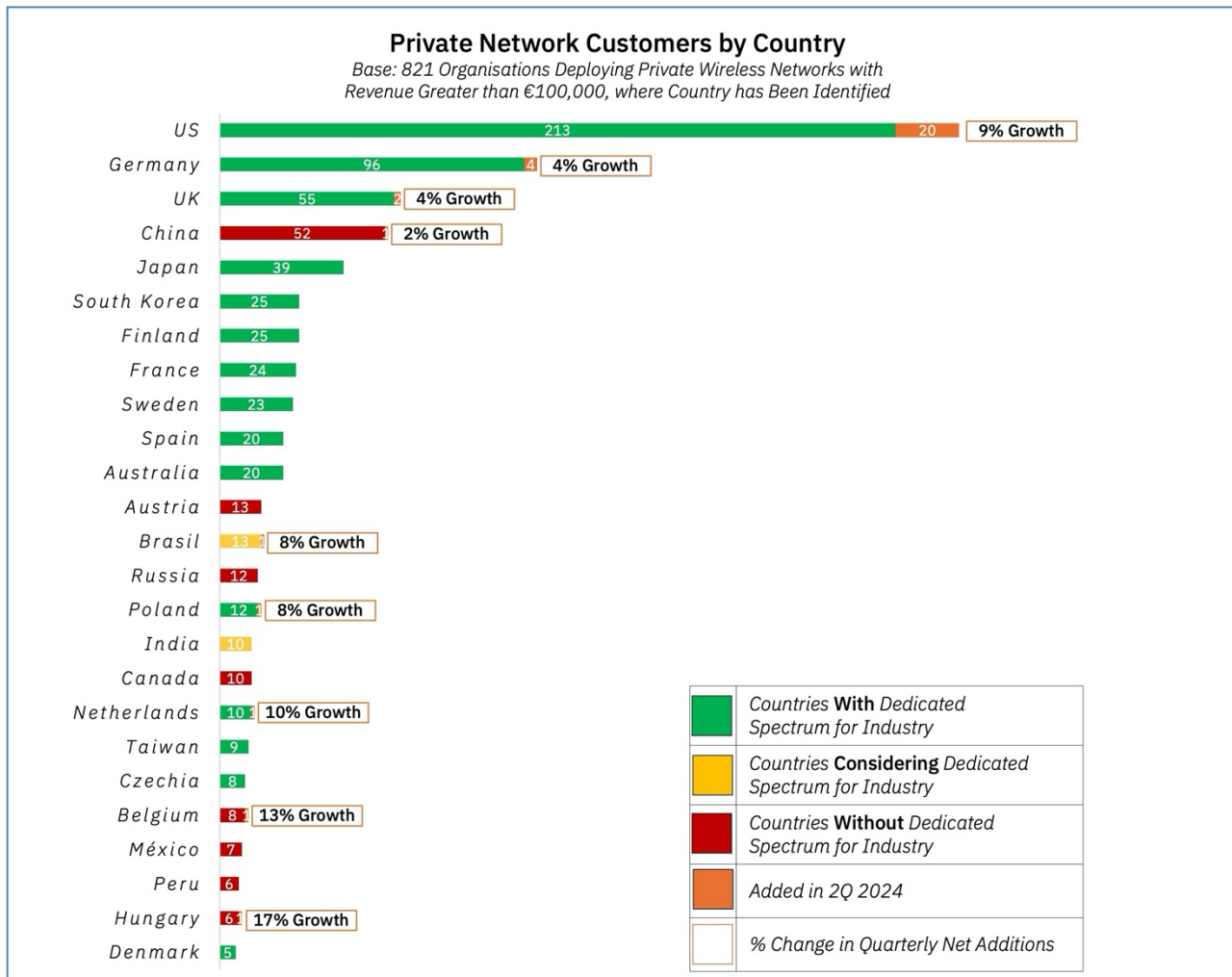
Specifically, proposals to significantly increase power levels for CBRS Devices (CBSDs) and significantly relax emission limits across the band would transform CBRS into yet another high-power, macro cellular band. Such changes would fundamentally modify CBRS licenses and undermine the Commission's bipartisan vision for CBRS as a lower-power, small-cell band that supports broad access and numerous applications. They would also imperil the technical progress made over the last decade through collaboration between the Commission, federal agencies, and industry. Moreover, these changes would undermine the collaboration between federal stakeholders and industry to determine technical parameters that support commercial operations while protecting critical national security requirements.

The Commission has already acted to make 380 MHz of 3 GHz mid-band spectrum available for high-power, macro cellular services, including by relocating and compressing military operations out of the 3.45-3.55 GHz band. We would note that these allocations were in addition to the mobile carriers' existing spectrum holdings, completing a portfolio of low, mid, and high-band spectrum holdings. By contrast, the low-power, localized CBRS ecosystem only has access to 150 MHz of spectrum, which is also utilized by the mobile carriers, and CBRS access is preemptible by incumbent DoD operations.

The changes proposed by a few parties endanger significant investments made under the current framework by users who paid for Priority Access Licenses (PAL) at auction and purchased and deployed equipment in both PAL and General Authorized Access (GAA) spectrum with reliance on the existing technical rules. It would also disrupt the numerous innovative use cases and industries that rely on the unique CBRS framework -- many of which were not typical users of cellular technologies but have embraced this spectrum to develop innovative services, create new jobs, and drive efficiency.

Private wireless networks, enabled by CBRS, are critical for driving U.S. innovation, enhancing operational efficiency, and securing communications across industries. CBRS has positioned the U.S. as the global leader in private and enterprise wireless networks according to the GSA's *Private Mobile Networks Summary Report* (September 2024). This is particularly remarkable given that CBRS is a U.S.-specific band, unlike the others covered in the report that are available globally.

The chart below is from GSA's *Private Mobile Networks Summary Report*, September 2024. The same report notes that CBRS (3GPP b48/n48) ranks globally as the 2nd most popular band for Private Network deployments, despite being a U.S.-specific band.



Transforming CBRS into a high-power, macro cellular band would undermine this leadership, depriving U.S. businesses and industries of a vital resource needed to deploy cutting-edge Private 5G and rural broadband networks effectively. Instead of controlling their own spectrum assets, allowing customized solutions to different industrial and enterprise challenges, America's companies and organizations would be forced to return to the off-the-shelf managed solutions offered by the largest carriers. These changes would also risk harm to critical military operations and undo the collaborative coordination that has resulted from the joint efforts between the Commission, federal agencies, and commercial users that has made CBRS such a success, and which provides a direction for future sharing with federal agencies.

The undersigned believe that the innovative CBRS low-power spectrum-sharing framework has fostered competition and connectivity across industries while protecting critical military operations. Fundamental changes to the technical rules governing this band would undermine investment-backed expectations of the many diverse users of CBRS and jeopardize this success, threatening America's continued leadership in wireless innovation. We urge you to uphold the principles that have made CBRS a model for spectrum management and a driver of U.S. technological leadership by rejecting misguided attempts to drastically raise power levels and emission limits in the band.

Sincerely,

Amazon.com Services LLC

American Library Association

Benton Institute for Broadband & Society

Barich, Inc.

Cambium Networks, Ltd

Celona, Inc.

Charter Communications, Inc.

Comcast Corporation

Cox Communications, Inc.

Deere & Company

Digital Global Systems

Hewlett Packard Enterprise Company (HPE)

Imagine Wireless

Lockheed Martin Corporation

Mediacom Communications Corporation

Miami-Dade Aviation Department

Midcontinent Communications

NCTA – The Internet & Television Association

Open Technology Institute at New America

Public Knowledge

The Schools, Health & Libraries Broadband (SHLB)
Coalition

Shure Incorporated

Spectrum for the Future

Tarana Wireless

WISPA – The Association for Broadband without
Boundaries

CC: The Honorable Geoffrey Starks, Commissioner, Federal Communications Commission
The Honorable Nathan Simington, Commissioner, Federal Communications Commission
The Honorable Anna Gomez, Commissioner, Federal Communications Commission