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General Comment

It's worth noting that there is no company manufacturing 5G ORAN radios in volume inside of the U.S today.

Establishing 5G ORAN radio volume manufacturing in the U.S. faces several important challenges:

- The 5G ORAN market is in its infancy. Producers of ORAN radios need U.S. customers to financially justify U.S. 5G ORAN radio manufacturing.
- The U.S. 5G ORAN customer base is expected to grow but the timeline and volumes are highly uncertain.
- Economic hurdles that must be overcome in order to justify U.S. manufacturing include:
 - Investment in capital equipment required for radio production
 - Investment in training required to develop the unique skills that are necessary to manufacture 5G radios
 - these skills are very rare in the U.S.

because radio manufacturing is now done outside of the U.S.

- Limited orders for ORAN radios create significant challenges for any manufacturer seeking to achieve the economies of scale necessary to compete with incumbent closed systems. Note that closed systems now enjoy enormous economies of scale because of their huge volumes.

- Celestica would welcome the opportunity to join with NTIA to find ways to overcome these challenges and build a secure, U.S. based manufacturing capability for 5G ORAN radios.