



April 17, 2023

Stephanie Wiener
Acting Chief Counsel
National Telecommunications and Information Administration
Washington, D.C. 20230

RE: Docket ID NTIA-2023-0003-0001

Dear Acting Chief Counsel Wiener,

I'm writing on behalf of the Hispanic Leadership Fund (HLF), a non-partisan advocacy organization dedicated to strengthening working families by advancing common-sense public policy solutions that foster liberty, opportunity, and prosperity. I write to you regarding the National Telecommunications and Information Administration (NTIA) Request for Comments on the Development of a National Spectrum Strategy (NSS).

HLF believes strongly in the benefits of the digital economy, particularly for communities affected by the digital divide. Mobile connectivity is a critical issue for American Hispanics. One quarter of Hispanic adults in the United States rely on their smartphones as the primary means of getting online.¹ Hispanic wireless users are twice as likely to rely on their devices to access the internet for everyday needs. As a result, Hispanic communities are particularly affected by spectrum policy management decisions.

We applaud the NTIA's pursuit of a coherent spectrum strategy and encourage a framework based on three pillars:

1. Identifying spectrum for licensed, full-power commercial use;
2. Supporting spectrum policies that encourage innovation, economic growth, and ending the digital divide; and
3. Resolving past interagency spectrum disputes and ensuring that the government speaks with one voice through NTIA on spectrum policy management decisions.

At the outset of the first listening session for the National Spectrum Strategy, NTIA Administrator Alan Davidson stated, "We want to identify 1500 megahertz of spectrum to study for future potential repurposing—an ambitious but achievable goal."² While we applaud this goal, we also believe identification for study is not enough. If the United States is to remain the

¹ Andrew Perrin, "Mobile Technology and Home Broadband 2021," *Pew Research Center*, June 3, 2021, <https://www.pewresearch.org/internet/2021/06/03/mobile-technology-and-home-broadband-2021/>

² Alan Davidson, "Remarks of Alan Davidson," *National Telecommunications and Information Administration*, March 30, 2023, <https://ntia.gov/speechtestimony/2023/remarks-alan-davidson>

leader in wireless communications, then NTIA should identify and repurpose spectrum for commercial use as part of the National Spectrum Strategy.

The most effective way to bring spectrum to the marketplace is through a competitive bidding process. Auctions have been the gold standard of spectrum policy for decades and have generated over \$100 billion for the U.S. Treasury.³

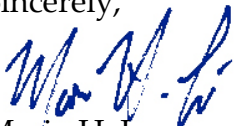
The United States is facing a severe deficit of spectrum allocated for commercial use, particularly exclusive use, full power spectrum. As I've written previously, "The United States has a deficit of spectrum, which could present a challenge for consistent internet connectivity as demand continues to increase—especially as use rises in areas like online schooling, remote work and telemedicine. The American wireless industry has access to just 5% of lower midband spectrum while government users have access to 12 times more in the midband."⁴

While a balanced spectrum policy should allow a place for licensed, unlicensed, and shared spectrum, it is imperative that NTIA prioritize the allocation of licensed spectrum in the mid-band frequencies. China, our chief economic competitor, as well as allies like France and Japan, have all identified significantly more spectrum for commercial use. If current trends continue, the United States faces losing its place as the global leader in standard setting for wireless technology. This is a footing that we should not cede.

Additionally, through the development of a National Spectrum Strategy, NTIA should ensure that policies promoting innovation, economic growth, and ending the digital divide are at the forefront of decision making. In the height of the pandemic, I wrote, "Millions of Americans in underserved communities who depend on wireless networks must be recognized by policymakers to ensure they have mobile access for work, education, and other uses."⁵ This still holds true today and ensuring a continuous pipeline of commercially viable spectrum is a key piece to this puzzle.

HLF applauds the NTIA for their ongoing work to develop a collaborative approach for allocating spectrum and resolving resolutions between government agencies and industry. Working together, we can fuel economic growth via innovation and continue toward increasing connectivity for all Americans.

Sincerely,



Mario H. Lopez

President

Hispanic Leadership Fund

³ Staughton, Jason. "The Greatest Auction Ever" – Q&A with Paul Milgrom, 2020 Nobel laureate," *National Science Foundation*, October 23, 2020. <https://beta.nsf.gov/science-matters/greatest-auction-ever-qa-paul-milgrom-2020-nobel>

⁴ Lopez, Mario H. "Spectrum auction legislation is a must for Congress," *Las Vegas Sun*, December 8, 2022. <https://lasvegassun.com/news/2022/dec/08/spectrum-auction-legislation-is-a-must-for-congress/>

⁵ Lopez, Mario H. "Bridging the Digital Divide," *Morning Consult*, October 1, 2020. <https://morningconsult.com/opinions/bridging-the-digital-divide/>