

The Dynamic Spectrum Alliance urges the FCC to re-evaluate changes to the CBRS band rules

Official comments from the Dynamic Spectrum Alliance

Washington D.C, USA, 12 February 2018: The Dynamic Spectrum Alliance (DSA) has expressed concern to the Federal Communications Commission (FCC) that changes to the Priority Access License (PAL) and other rules, first requested by petitioners and now proposed by the Commission, are both unnecessary and counterproductive to enabling the fullest use of the Citizens Broadband Radio Service (CBRS) band.

Replying to the FCC's request for petitions for rulemaking on the CBRS rules, the DSA urged that the proposed changes will harm the significant effort and investment that has been made by the industry and government over the last few years, which we are now at the cusp of seeing the results from. The DSA believes the Commission's Notice of Proposed Rulemaking (NPRM) will have significant negative impact on the opportunities of many new players that are planning to deploy infrastructure and that it serves only the interests of a few large wireless carriers.

In its NPRM, the FCC proposed changes which included increasing the length of licence terms from three years to ten years. In response to this, the DSA urged the FCC to retain the current three-year term for PALs as longer terms will front load and increase spectrum access costs to create a barrier to entry for many of the new and innovative investment opportunities that the CBRS band has created.

"We need a balanced approach to how we manage spectrum. We must recognise that spectrum in most places is unused most of the time, just by the very nature of how spectrum is utilized. There may be certain locations in dense urban areas with much higher utilization of individual bands, but even there, most spectrum is not being used all the time, so it creates a real opportunity for sharing that spectrum in a new way," said Kalpak Gude, President of the Dynamic Spectrum Alliance. "In reaching its conclusion, the Commission recognized that due to the unique requirements to protect incumbent users, and the propagation characteristics of the 3.5GHz frequency band, deployment in CBRS - and thus the size and length of licenses - would by necessity be different than in traditional cellular bands. The proposed rules did not enable fast or increased deployment of infrastructure, they merely enabled the PAL spectrum licenses to be used to exclude deployment by new infrastructure investors."

When the Commission approved the existing CBRS rules, there was significant excitement regarding the possibilities of using the dynamic access structure to unlock previously untapped spectrum in ways that have not been possible. DSA believes that the fundamental structure of the CBRS band that the Commission created remains the best path forward for achieving the goals of innovation, the broadest delivery of service, including to those that currently do not have adequate broadband services, and the most efficient use of spectrum.

"The Dynamic Spectrum Alliance is committed to supporting innovative solutions that will expand broadband solutions for consumers and businesses alike. The DSA is open to changes to improve the CBRS rules and opportunities for new entrants and new infrastructure investment. It does not believe, however, that the proposed modifications generally further those goals. The weight of the evidence and the majority of comments in

this proceeding demonstrate what the DSA has maintained from the beginning: The current CBRS rules are a fair and appropriate balance between the requirements of diverse types of service providers and the requirements of traditional mobile applications. We therefore agree that the FCC should allow the existing work in the CBRS band to move forward without significant changes to the rules and allow for the abundant spectrum future the Commission envisioned, which is close at hand,” concluded Gude.

To read the Dynamic Spectrum Alliance’s complete comments to the FCC, please visit: http://dynamicspectrumalliance.org/wp-content/uploads/2018/02/DSA-CBRS-NPRM-Reply-Comments_Final.pdf.

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About the Dynamic Spectrum Alliance

The Dynamic Spectrum Alliance is a global organization advocating for laws and regulations that will lead to more efficient and effective spectrum utilization. The DSA’s membership spans multinationals, small- and medium-sized enterprises, and academic, research, and other organizations from around the world, all working to create innovative solutions that will increase the amount of available spectrum to the benefit of consumers and businesses alike.

For further information about the Dynamic Spectrum Alliance, please visit www.dynamicspectrumalliance.org/, or follow [@dynamicspectrum](https://twitter.com/dynamicspectrum) on Twitter. Alternatively joins the Alliance on [Facebook](#) or [LinkedIn](#).

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