

VIA ELECTRONIC FILING  
Hon. Ajit Pai, Chairman  
Federal Communications Commission  
445 12th Street S.W.  
Washington, DC 20554

February 14, 2020

***RE: Unlicensed Use of the 6 GHz Band, ET Docket No. 18-295; Expanding Flexible Use in Mid-Band Spectrum between 3.7 and 24 GHz, GN Docket No. 17-183***

Dear Chairman Pai,

Thanks to your leadership, the country could soon see tremendous technological and economic rewards of opening up new spectrum for unlicensed use.

By opening the 6 GHz band for unlicensed use, the FCC would enable massive technological innovation by designating a highly underutilized portion of radio spectrum for wider and more efficient use.

Regrettably, some incumbent users in the band, led by the public utility industry, are claiming that shared use of the spectrum will lead to harmful interference, and are conjuring up extreme hypothetical examples. There are too many benefits to opening up this valuable spectrum to take these extreme warnings at face value.

Unlicensed spectrum brings immense benefits to Americans primarily through disparate swaths of radio spectrum in the 900 MHz, 2.4 GHz and 5 GHz bands, among others. It is a powerhouse for the U.S. economy, providing an estimated economic value of at least \$500 billion a year and growing.<sup>1</sup>

We believe similar benefits will follow by permitting unlicensed use to share 1200 MHz in the 6 GHz band with incumbents.

More unlicensed spectrum for next-generation Wi-Fi would deliver faster speeds— in people’s homes and business enterprises of all kinds — and be a bridge to the next generation of IoT, AR, and VR devices for consumers. More unlicensed spectrum can help break down digital divides in rural and other underserved areas of the country by allowing new broadband uses, and enabling broadband access technologies like fixed wireless broadband to grow further. And designating more unlicensed spectrum promises the development of technologies we can’t even envision right now, which will make our lives more free, fruitful, and better.

Our country’s best engineers are waiting for the FCC to unleash this valuable, underutilized resource. These men and women are the “evasive entrepreneurs” that Adam Thierer

---

<sup>1</sup> “The next generation of wireless innovation,” by Representatives Doris Matsui and Brett Guthrie; and FCC Commissioners Jessica Rosenworcel and Mike O’Rielly, 09/12/18, accessed at <https://thehill.com/blogs/congress-blog/technology/406142-the-next-generation-of-wireless-innovation>.

describes — constantly innovating around outdated rules and norms that defy common sense.

Although some incumbent users of the 6 GHz spectrum paint a bleak and fearsome picture of sharing this spectrum, technology already successfully in use can enable coexistence in the band. Put simply, utilities, public safety, and Wi-Fi can and should safely share the band.

We are encouraged by your recent statement that you “truly believe that American consumers can have the best of both worlds. They can have the electric utilities using the spectrum in a way that allows them to deliver power more efficiently, and they can have the benefit of unlicensed innovation.”

We applaud your efforts to get more out of this valuable resource, and stand ready to assist you as you move forward with this important work.

Respectfully,

*Jeff Mazzella*

President, Center for Individual Freedom

*Matthew Kandrach*

President, Consumer Action for a Strong Economy

*Hance Haney*

Director and Senior Fellow of the Technology & Democracy Project, Discovery Institute

*Wayne T. Brough*

President, Innovation Defense Foundation

*Bartlett Cleland*

President, Innovation Economy Institute

*Andrew Langer*

President, Institute for Liberty

*Tom Giovanetti*

President, Institute for Policy Innovation

*Seton Motley*

President, Less Government

*Charles Sauer*

Founder / President, Market Institute

*David Williams*  
President, Taxpayers Protection Alliance