

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20554**

In the Matter of )  
 )  
Allocation and Service Rules for the 1675-1680 )  
MHz Band ) WT Docket No. 19-116  
 )

**REPLY COMMENTS OF PUBLIC KNOWLEDGE**

**I. INTRODUCTION.**

Public Knowledge (“PK”) submits these Reply Comments in support of the Federal Communications Commission’s (“Commission” or “FCC”) Notice of Proposed Rulemaking (“NPRM”) proposing to reallocate spectrum in the 1675-1680 MHz band on a co-primary basis for terrestrial-fixed and mobile use on a shared basis with existing federal users.<sup>1</sup> Policies that maximize the efficient use of finite spectrum resources through sharing between federal and commercial users serve the public interest.

**II. THE FEDERAL COMMUNICATIONS COMMISSION SHOULD MOVE FORWARD WITH THE REALLOCATION OF THE 1675-1680 MHZ BAND.**

Enabling shared use of the 1675-1680 MHz band will serve the public interest. The Commission has correctly explained that the growth of mobile broadband service has led to societal and economic benefits.<sup>2</sup> Further, it has been the policy of multiple Administrations and Congress to improve the efficiency of federal spectrum use and identify bands where federal users can share spectrum with commercial or unlicensed users, including the 1675-1680 MHz

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<sup>1</sup> Allocation and Service Rules for the 1675-1680 MHz Band, WT Docket No. 19-116, *Notice of Proposed Rulemaking and Order*, FCC 19-43, 2 ¶ 1, 6 ¶ 12 (rel. May 13, 2019) (“NPRM”).

<sup>2</sup> *Id.* at 2 ¶ 4.

band.<sup>3</sup> Spectrum is a finite resource. Federal agencies hold significant quantities of valuable spectrum resources, and allocation of new, cleared frequencies for commercial use is likely to be increasingly rare. Therefore, it best serves the public interest for the Commission (alongside NTIA) to craft spectrum policies that ensure federal users have access to the spectrum needed to accomplish their missions in the most efficient manner possible, while freeing up spectrum for unlicensed, licensed, or shared use, where feasible. Here, the Commission’s proposal to permit shared use of the 1675-1680 MHz band will help meet consumer demand for additional spectrum for mobile broadband use.<sup>4</sup>

As Commissioner Carr has correctly pointed out, reallocating the 1675-1680 MHz band sets the stage for combining these frequencies with nearby spectrum bands – freeing up 40 megahertz of lower, mid-band spectrum with propagation characteristics suitable for deploying high-speed mobile broadband to unserved and underserved rural communities.<sup>5</sup> In a highly concentrated wireless market, bringing additional spectrum resources to the market is necessary to spur innovative and competitive service offerings. After all, competition, rather than consolidation is the key to bridging the digital divide and making better quality and lower priced services available to consumers. New wireless business models, spurred by access to spectrum, would enable a new ecosystem of hardware, software, and applications, have the potential to bring some much needed competition and innovation to an excessively consolidated wireless marketplace, and foster the potential for innovation, increased consumer welfare, and job creation.

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<sup>3</sup> See *id.* at 3-4 ¶¶ 5-7. See also Comments of CTIA, WT Docket No. 19-116, at 1-3 (filed June 21, 2019) (“CTIA Comments”).

<sup>4</sup> See, e.g., CTIA Comments at 4.

<sup>5</sup> See *NPRM* at 51, Statement of Commissioner Brendan Carr.

### III. CONCLUSION.

For the foregoing reasons, the Commission should move forward with its proposal to reallocate spectrum in the 1675-1680 MHz band on a co-primary basis for terrestrial-fixed and mobile use on a shared basis with existing federal users.

Respectfully submitted,

/s/ \_\_\_\_\_

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