

March 5, 2018

Ms. Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, District of Columbia 20554

RE: *In the Matter of Accelerating Wireless Broadband Deployment by Removing Barriers to Infrastructure, WT Docket No. 17-79*

Dear Ms. Dortch,

Representing more than 5,000 small and medium-sized app developers and tech innovators across the United States, ACT | The App Association (App Association) applauds the Federal Communications Commission (FCC or Commission) for its leadership in streamlining 5G infrastructure deployment. The future of our digital economy will require the robust capacity of a 5G network. The rules articulated in the Commission's *Draft Order*<sup>1</sup> will pave the way for the United States to remain a global leader in wireless broadband and provide advanced wireless broadband capabilities to American businesses and consumers. Strong 5G networks will directly benefit our country's dynamic community of app developers and internet of things (IoT) innovators, as well as our growing internet-enabled business community. We need the Commission's clear commitment to 5G deployment to ensure the United States retains its competitive edge. This will, in turn, bring more assurances to our members that the \$143 billion app economy they represent<sup>2</sup> continues to innovate and grow.

---

<sup>1</sup> *In the Matter of Accelerating Wireless Broadband Deployment by Removing Barriers to Infrastructure, WT Docket No. 17-79, Report and Order (rel. March 1, 2018), available at [https://apps.fcc.gov/edocs\\_public/attachmatch/DOC-349528A1.pdf](https://apps.fcc.gov/edocs_public/attachmatch/DOC-349528A1.pdf) (5G Wireless Draft R&O)*

<sup>2</sup> ACT | The App Association, *State of the App Economy*, Fifth Edition (Apr. 2017), available at <http://actonline.org/2017/04/20/state-of-the-app-economy-report-outlines-growth-dynamism-of-the-app-ecosystem/>.

In our *State of the App Economy* report, we explore how the ever-evolving IoT ecosystem impacts companies, even those unaffiliated with the information and communication technology sector. The future of IoT innovations and the app economy will depend on the strength and density of 5G networks, which are supported by myriad spectrum bands and different types of infrastructure, including small cell deployment, that seamlessly work together. Failure to adequately develop U.S. infrastructure and spectrum resources will harm both the economy and consumers at large. With the prospect of countless IoT-connected devices entering our communications networks, networks will become inundated and macro sites alone will not be sufficient to manage the congestion. For this reason, we believe small cell deployment, which can add density to a network to help manage increasing traffic,<sup>3</sup> is critical to the realization of a robust 5G network. Many of our members supply the “middleware” that connects IoT devices, therefore, it is imperative that the Commission maintain its focus on securing U.S. leadership in the 5G wireless market.

The App Association was encouraged by FCC Commissioner Brendan Carr’s recent speech announcing the Commission’s Order to streamline 5G infrastructure deployment. In his speech, he stated that the proposed measures could reduce costs of small cell deployment by 80 percent and, more importantly, reduce the buildout timelines by about half.<sup>4</sup> Such steps will support more efficient deployment of this important aspect of our wireless infrastructure while increasing its densification as well. Our members rely on these networks and support measures that will allow for better wireless connectivity and increased broadband speeds, which is why we support the captioned proceeding.

In conclusion, the App Association applauds the Commission’s recent steps to remove as many regulatory barriers as possible to support and advance 5G deployment.<sup>5</sup> The United States’ communications infrastructure needs constant repair and improvement, and we believe the Commission should play a central role in the deployment of a robust internet infrastructure. The proposed efforts will also be vital in closing the digital divide, and we are committed to assisting the Commission in this respect. We are eager to make America’s 5G leadership a reality and look forward to working with the Commission on this important issue.

---

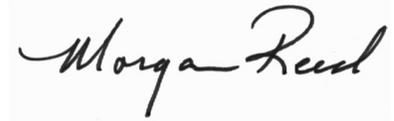
<sup>3</sup> Ruckus, *Dealing with Density: The Move to Small-Cell Architectures*, White Paper (2014) available at <https://ruckus-www.s3.amazonaws.com/pdf/wp/wp-dealing-with-density.pdf>.

<sup>4</sup> Remarks of FCC Commissioner Brendan Carr at the Consumer Technology Association’s 5G Day “ensuring the United States is 5G Ready” (2018), available at [https://transition.fcc.gov/Daily\\_Releases/Daily\\_Business/2018/db0228/DOC-349499A1.pdf](https://transition.fcc.gov/Daily_Releases/Daily_Business/2018/db0228/DOC-349499A1.pdf).

<sup>5</sup> 5G Wireless Draft R&O.

Thank you in advance for your time and consideration on this important issue.

Sincerely,

A handwritten signature in black ink that reads "Morgan Reed". The signature is written in a cursive style with a light gray background behind it.

Morgan Reed  
President

ACT | The App Association  
1401 K St NW (Suite 501)  
Washington, District of Columbia 20005