

April 27, 2018

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

Re: Notice of Ex Parte Communication, *Accelerating Wireless Broadband Deployment by Removing Barriers to Infrastructure Investment*, WT Docket No. 17-79; *Accelerating Wireline Broadband Deployment by Removing Barriers to Infrastructure Investment*, WC Docket No. 17-84; *Advanced Methods to Target and Eliminate Unlawful Robocalls*, CG Docket No. 17-59; *Promoting Investment in the 3550-3700 MHz Band*, GN Docket No. 17-258; *Accelerating Adoption and Accessibility of Broadband-Enabled Health Care Solutions and Advanced Technologies*, GN Docket No. 16-46; *Amendment of Part 15 of the Commission's Rules for Unlicensed Operations in the Television Bands, Repurposed 600 MHz Band, 600 MHz Guard Bands and Duplex Gap, and Channel 37*, Amendment of Part 74 of the Commission's Rules for Low Power Auxiliary Stations in the Repurposed 600 MHz Band and 600 MHz Duplex Gap, ET Docket No. 14-165; *Unlicensed Operation in the TV Broadcast Bands*, ET Docket No. 04-186; *Additional Spectrum for Unlicensed Devices Below 900 MHz and in the 3 GHz Band*, ET Docket No. 02-380; *Amendment of Part 15 of the Commission's Rules for Unlicensed White Space Devices*, ET Docket No. 16-56, RM-11745

Dear Ms. Dortch,

On April 25, 2018, ACT | The App Association (App Association) staff Brian Scarpelli and Graham Dufault; and Chris Adams, SouthernDNA; David Bain, TM Technologies Inc. and the Technology Safety Council; Joe Bonnell, Alchemy Security; Rob Coons, Scout Military; Gus Emery, Kosmik Innovations; Betsy Furler, Communication Circles and Your App Lady; Andrew Savitz, SpeakEasy and Canned Spinach; Chris Sims, Sigao Studios; Scott Weiner, Neueon; and Julie Yack, Colorado Technology Consultants met with Federal Communications Commission (Commission) Commissioner Michael O'Rielly; Brooke Ericson, Chief of Staff, Legal Advisor, Media; and Amy Bender, Legal Advisor, Wireline.

At the start of the meeting, the App Association described the characteristics of its membership and the impact its businesses have as part of a thriving app economy. The App Association represents more than 5,000 app makers and connected device companies across the mobile economy that leverage the connectivity of smart devices to create innovative solutions that make our lives better. Our members provide the touchpoint to the mobile revolution, which continues to create new efficiencies across sectors, from finance to healthcare to manufacturing. As detailed in our annual State of the App Economy report,¹ the \$950.6 billion app ecosystem is led by U.S. companies that employ more than 4.7 million Americans. More than 80 percent of the top U.S. app companies are located outside of Silicon Valley, and many are headquartered in rural areas, but all depend on strong broadband to grow and create new jobs.

The App Association shared support for the Commission's recent steps outlined in the dockets listed above that are working to remove regulatory barriers to next generation wireless broadband and 5G deployment. The App Association encouraged the Commission to support wireless broadband infrastructure buildout by streamlining regulations for small cell deployment, which will enable more efficient densification of today's networks and the deployment of advanced wireless infrastructure. App Association members depend on strong connectivity to deliver their innovations to countless consumer and enterprise users across America. The rise of internet of things (IoT) innovations will only increase the need for robust wireless connectivity and faster broadband speeds.

In addition, the App Association expressed its support for efforts that allow use of the 3.5 GHz band for broadband purposes.² The 3.5 GHz band is particularly useful for wireless broadband connectivity because it can extend the reach of wireless broadband services. This would support the implementation of smart cities and other IoT applications such as remote monitoring of patient-generated health data (PGHD) or the use of broadband-enabled sensors to improve public safety.

The App Association also expressed support of enhancing last-mile broadband connectivity for Americans through unused television white space (TVWS) spectrum bands. Leveraging the TVWS bands will augment mobile broadband access for both U.S. urban and rural markets, helping to bridge the digital divide and support more IoT capabilities for consumers and enterprises. The App Association reiterated their belief that it is imperative that the Commission rule on the petitions for reconsideration related to the duplex gap and channel 37 proceeding and take steps to ensure database accuracy.

¹ ACT | The App Association, State of the App Economy, Fifth Edition (Apr. 2018), available at http://actonline.org/wp-content/uploads/ACT_2018-State-of-the-App-Economy-Report_4.pdf.

² Comments of ACT | The App Association, GN Docket No. 17-258, available at http://actonline.org/wp-content/uploads/01292018_ACT-Filing_on_3.5_GHz_NPRM.pdf.

The App Association also described its concern regarding the danger illegal robocalls pose to countless Americans. The App Association, which served on the Robocall Strike Force and contributed substantively to its report,³ voiced its support for collaborative efforts between the Commission, industry, consumers, and other stakeholders to combat unlawful robocalls, while promoting and leveraging innovative solutions developed by the private sector.

Finally, the App Association discussed its efforts to advance the uptake of digital health innovations through its Connected Health Initiative,⁴ and its support for the Commission's efforts to secure broadband connectivity for healthcare.⁵ The wide array of connected health technology products and services—such as telehealth, remote monitoring (RM) of PGHD, and telemonitoring—provide the ability to save countless American lives while lowering healthcare costs. The healthcare sector plays a crucial role in our society. As a result, the Commission's efforts to speed broadband deployment are essential, and improvements must be made to America's critical infrastructure to support the use of connected health technologies and products.

³ See Robocall Strike Force, Robocall Strike Force Six Month Report (2017), <https://www.fcc.gov/file/12311/download>.

⁴ www.connectedhi.com

⁵ *E.g.*, *Promoting Telehealth in Rural America*, WC Docket No. 17-310, Notice of Proposed Rulemaking and Order (2017).

Pursuant to the Commission's rules,⁶ this *ex parte* notice (with meeting materials appended) is being electronically filed via the Commission's Electronic Comment Filing System. A copy of this submission is being provided electronically to the meeting attendees.

Sincerely,



Brian Scarpelli
Senior Global Policy Counsel

Graham Dufault
Senior Director of Public Policy

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

Attachment: ACT | The App Association's 2018 State of the App Economy Report

⁶ 47 C.F.R. § 1.1206.