



September 11, 2020

**[Electronically Submitted]**

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

RE: *Notice of Ex Parte Communication, CG dockets RM-11791, RM-11778, RM-11840; GN dockets 14-177, 17-183; OET dockets 18-295, 20-36; WC dockets 19-195, 11-10, 17-84, 18-213; WT docket 10-112; WTB dockets 18-122, 19-38, 19-71, 19-348, 19-250*

Dear Ms. Dortch,

On September 9, 2020, ACT | The App Association (App Association) staff Alexandra Cooke, Graham Dufault, Caitlin Irr, Morgan Reed, Brian Scarpelli, Brad Simonich, and Madeline Zick along with App Association members Jeff Hadfield, 1564b; Joe Bonnell, Alchemy Security; Gent Hito, CData Software and /n software; Julie Yack, Colorado Technology Consultants; Dave Noderer, ComputerWays; Marc Fischer, Dogtown Media; Betsy Furler, For All Abilities; Heyu Huang, Fresco Capital; Qyana Stewart, GlobalForce Tech Consulting; John Peterson, Main Line Software; Sarah Marlowe, Particle Health; Sebastian Holst, Qi-fense; Douglas McDowell, SentryOne; Grey Haygood, SouthernDNA; Becca Williams, Thought Distillery; and Robert Coons, Walker Tracker met with Commissioner Mike O’Rielly and Joel Miller, Chief of Staff and Media Legal Advisor where the above-noted dockets were discussed.

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 located across the United States and around the globe that power the global digital economy. Our members 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 consumer and enterprise sectors, from finance to healthcare to manufacturing to entertainment. The \$1.7 trillion app ecosystem is led by U.S. companies that employ more than 5.9 million Americans. More than 80 percent of the top U.S. app companies are located outside of Silicon Valley, with many headquartered in rural areas, and all depend on strong broadband to grow and create new jobs.

App Association members shared their support for Commission progress in making spectrum policy changes to enable 5G innovations in America. The App Association has long supported and continues to support the Commission's efforts to bring better broadband to Americans by opening more spectrum and reducing regulatory burdens for infrastructure deployment, including in the Chairman's new proposal to make the 3.45-3.55 GHz band available for commercial use throughout the contiguous United States.<sup>1</sup> App Association economic analysis shows that deployment of 5G wireless networks will create 8.5 million jobs in the United States over the next five years, enabling improvements in economic productivity, employment, and consumer value.<sup>2</sup> 5G will affect the labor market through direct and indirect means; while the additional labor required to build out the network to deploy 5G will certainly create the most immediate demand for new jobs, the broadest impact on the labor market comes from new employment opportunities through the way 5G will enable new applications, services, ways of doing business, and general growth of businesses. Workers enabled by this will earn more than \$560 billion during that time, create \$1.7 trillion in additional output, and add over \$900 billion to U.S. gross domestic product (GDP).<sup>3</sup>

Specifically, the App Association noted its support for Commission efforts to enhance 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, bridging the digital divide and support new and improved IoT capabilities for consumers and enterprises. The App Association noted its support for Commission action to resolve remaining proceedings to put TVWS rules into place as soon as possible, and to resolve such rules no later than the end of 2020 consistent with the Commission's public commitment to do so.<sup>4</sup>

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<sup>1</sup> Press Release, "Chairman Pai Proposes to Make More Critical Mid-Band Spectrum Available for 5G" (Sept. 8, 2020), available at <https://www.fcc.gov/document/chairman-pai-proposes-more-critical-mid-band-spectrum-5g>.

<sup>2</sup> James Prieger, "An Economic Analysis of 5G Wireless Deployment: Impact on U.S. and Local Economies" (Feb. 2020), available at <https://ecfsapi.fcc.gov/file/10417521421416/ACT%20Ex%20Parte%20Notice%20re%205G%20Economic%20Analysis%202020.pdf>.

<sup>3</sup> *Id.*

<sup>4</sup> Letter from FCC Chairman Ajit Pai to House Reps. Welch, Rodgers, DelBene, Griffith, O'Halleran, Wittman, Ryan, Scott, Collins, Johnson, Eshoo, Wenstrup, Matsui, and Beutler (August 21, 2020), available at <https://docs.fcc.gov/public/attachments/DOC-366546A2.pdf>.

The App Association also shared support for the Commission's efforts to unleash the potential of the 6 GHz band,<sup>5</sup> which will also enable growth and job creation. With new unlicensed 6 GHz connectivity points representing a crucial use case of efficient wireless connectivity, Commission action unleashing 6 GHz technology fully aligns with its overarching goal of advancing 5G deployments. The App Association urged the Commission to resolve remaining issues in 6 GHz band proceedings as soon as practicable based on a well-developed record (that includes substantial technical evidence) indicating that proposed unlicensed use will not result in harmful interference in the 6 GHz bands.<sup>6</sup>

The App Association further discussed its continued support for the Commission's efforts to bring better broadband to Americans through developing better broadband maps,<sup>7</sup> consistent with requirements in the Broadband DATA Act.<sup>8</sup> The App Association stressed that more accurate and granular maps that can correctly identify unconnected or under-connected areas are essential to the Commission accomplishing its mission (e.g., appropriately targeting its Universal Service Fund support by deploying broadband infrastructure to the areas it most needed), and to assist App Association members in business planning and product development, particularly for those based and/or serving customers in rural areas that lack the robust connectivity needed to support new and innovative internet products and services.

Finally, the App Association discussed its efforts to advance the uptake of digital health innovations through its Connected Health Initiative<sup>9</sup> and its support for the Commission's efforts to secure broadband connectivity for healthcare. The wide array of connected health technology products and services—such as live voice/video telehealth and remote monitoring of patient-generated health data—provide the ability to save countless American lives while lowering healthcare costs. The App Association expressed support for the Commission's ongoing efforts to support innovative uses of broadband to address the ongoing COVID-19 public health emergency in America.<sup>10</sup> Further, the App Association urged the Commission to finalize its proposed Connected Care Pilot Program<sup>11</sup> as soon as possible.

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<sup>5</sup> *Unlicensed Use of the 6 GHz Band, et al.*, Report and Order and Further Notice of Proposed Rulemaking, FCC No. 20-51, ET Docket No. 18-295, GN Docket No. 17-183 (rel. Apr. 24, 2020).

<sup>6</sup> *E.g.*, *Ex parte* of Apple, Broadcom et al., ET Docket No. 18-295, GN Docket No. 17-183 (Nov. 12, 2019); *Ex parte* of Apple, Broadcom et al., ET Docket No. 18-295, GN Docket No. 17-183 (Dec 9, 2019).

<sup>7</sup> *In the Matter of Establishing the Digital Opportunity Data Collection, et al.*, Report & Order and Third Further Notice of Proposed Rulemaking, WC Docket No. 19-195, et al. (2020), available at <https://docs.fcc.gov/public/attachments/FCC-20-94A1.pdf>.

<sup>8</sup> Broadband Deployment Accuracy and Technology Availability Act, Pub. L. No. 116-130, 134 Stat. 228 (2020) (codified at 47 U.S.C. §§ 641-646).

<sup>9</sup> [www.connectedhi.com](http://www.connectedhi.com).

<sup>10</sup> *Promoting Telehealth for Low-Income Consumers; COVID-19 Telehealth Program*, WC Docket Nos. 18-213, 20-89, Report and Order (2020).

<sup>11</sup> *In the Matter of Promoting Telehealth for Low-Income Consumers*, WC Docket No. 18-213, Notice of Proposed Rule Making (2019).

Pursuant to the Commission's rules,<sup>12</sup> 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

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cc: Commissioner O'Rielly  
Joel Miller

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<sup>12</sup> 47 C.F.R. § 1.1206.