



September 23, 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, EA Docket No. 21-233; ET Docket Nos. 21-232, 21-264; GN docket No. 17-183; OET docket No. 18-295; WC dockets 11-10, 17-97, 17-84, 18-213, 19-195, 21-291*

Dear Ms. Dortch,

On September 21, 2020, ACT | The App Association (App Association) staff Alexandra Cooke, Graham Dufault, Caitlin Irr, Matthew Ruth, Brian Scarpelli, Brad Simonich, Chelsea Thomas, Leanna Wade, and Madeline Zick along with App Association members Andrew Brust, Blue Badge Insights; Marc Fischer, Dogtown Media; Jennifer Fisher, MotionMobs; Stephen Forte, Fresco Capital; Jeff Hadfield, 1564B; Sebastian Holst, vFortified, LLC; Parag Shah, Vemos; Becca Williams, Thought Distillery; and Julie Yack, Colorado Technology Consultants met with William Davenport, Chief of Staff & Senior Legal Advisor for Wireless and International for Commissioner Starks and Austin Bonner, Legal Advisor for Wireline and Public Safety for Commissioner Starks to discuss the above-noted dockets.

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. App Association members build and leverage the connectivity of smart devices to create innovative solutions across consumer and enterprise use cases, driving the internet of things (IoT) forward. The \$1.7 trillion app ecosystem is led by U.S. companies that employ more than 5.9 million Americans, with more than 80 percent located outside of Silicon Valley, often headquartered in rural areas, and all depend on strong broadband to grow and create new jobs.

The App Association shared its continued support for the Commission's efforts to bring better broadband to Americans through developing better broadband maps, consistent with requirements in the Broadband DATA Act,¹ which will drive more efficient and equitable access to broadband. The App Association stressed that more accurate and granular maps, that can correctly identify unconnected and underserved communities and 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 where it is most needed) and to assist App Association members in product development. Broadband access, and understanding which areas lack access, is particularly important for those members based and/or serving customers in rural areas that lack the robust connectivity needed to support new and innovative internet products and services. The App Association also noted its support for the Commission's ongoing efforts to close the digital divide, such as the Emergency Broadband Benefit.

The App Association also shared its support for Commission progress in making spectrum policy changes to enable 5G innovations in America. 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.² 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 access to 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).³

The App Association continues to support the Commission's efforts to bring broadband to Americans by opening more spectrum for both licensed and unlicensed use as well as supporting infrastructure deployment. The App Association shared support for the Commission's efforts to unleash the potential of the 6 GHz band.⁴ The App Association urged the Commission to resolve remaining issues in its 6 GHz band proceedings as soon as possible based on the well-developed record (that includes substantial technical evidence) indicating that proposed unlicensed use will not result in harmful interference in the 6 GHz bands,⁵ and encouraged the Commission to act further to support the use of new WiFi

¹ Broadband Deployment Accuracy and Technology Availability Act, Pub. L. No. 116-130, 134 Stat. 228 (2020) (codified at 47 U.S.C. §§ 641-646).

² 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>.

³ *Id.*

⁴ *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).

⁵ *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).

technology for mobile operations and to permit very low power devices to operate across the entire 6 GHz band. Similarly, the App Association urged the Commission to advance new and innovative sharing arrangements in the 60 GHz band,⁶ and to explore new bands (such as the 3.1 and 7 GHz bands) for sharing arrangements that will support both licensed and unlicensed uses for a wide variety of IoT use cases.

Additionally, the App Association discussed its efforts to advance the uptake of digital health innovations through its Connected Health Initiative⁷ 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.⁸ Further, the App Association discussed how the Commission's vital work is not only helping connect Americans to new means and modalities of care today, but also is a crucial contribution to transforming the system as a whole in realizing value-based care, in complement to the actions of other federal agencies, as well as state and local governments.⁹

The App Association also conveyed its support for the Commission's efforts to secure U.S. communication networks and equipment,¹⁰ and urged the Commission to ensure that any changes made to its successful equipment authorization process to address security concerns do not impair its effectiveness.

The App Association also described its concerns with the danger illegal robocalls pose to countless Americans. The App Association, which has long served on the Robocall Strike Force, and contributed substantively to its report, continues to support 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 noted its continued commitment to enhancing disability access to communications for all Americans with disabilities, and to ensuring that accessibility is considered throughout the technology development process ("accessibility-by-design").

⁶ *In the Matter of Amendment of Section 15.255 of the Comm'n's Rules*, Notice of Proposed Rulemaking, ET Docket No. 21-264, FCC 21-83 (rel. July 14, 2021).

⁷ www.connectedhi.com.

⁸ *Promoting Telehealth for Low-Income Consumers*, WC Docket No. 18-213; *COVID-19 Telehealth Program*, WC Docket No. 20-89; *Rural Health Care Universal Support Mechanism*, WC Docket No. 02-60.

⁹ *Ex parte* of the Connected Health Initiative, WC Docket Nos. 18-213, 20-89, 02-60 (Sept. 16, 2021).

¹⁰ *Protecting Against National Security Threats to the Communications Supply Chain through the Equipment Authorization Program*, Notice of Proposed Rulemaking and Notice of Inquiry, FCC 21-73, ET Docket No. 21-232 (rel. June 17, 2021).

Pursuant to the Commission's rules,¹¹ 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,

A handwritten signature in black ink, appearing to read 'Brian Scarpelli', with a stylized, cursive script.

Brian Scarpelli
Senior Global Policy Counsel

Leanna Wade
Policy Associate

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¹¹ 47 C.F.R. § 1.1206.