

July 9, 2019

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

RE: 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

Dear Ms. Dortch,

We are small business app companies that make innovative devices and applications across all sectors—from precision agriculture to connected health—that require strong, reliable broadband connections by any means available. We want to express our support for Microsoft's recent petition for a rulemaking that asks the Federal Communications Commission (FCC or Commission) to further codify rules for unlicensed wireless use in the relevant television white space (TVWS) spectrum bands.¹ We believe the recommendations Microsoft brings forward in its petition are great next steps and complement the Commission's recent Order enacted in March of this year.² As the Commission is aware, TVWS can provide wireless access for up to 10 miles and provide wireless infrastructure in otherwise undeployable areas (e.g., mountainsides). However, we fear that no company will invest in this critical resource without clear rules, which is why we support Microsoft's petition due to its path forward for wider use of TVWS.

The simple fact is that the app economy depends on developers' ability to access broadband. Many of us operate and hire in areas away from traditional "tech hubs" in the United States and there are wide swaths of the country with little to no broadband connectivity. The Commission has long recognized broadband as a great resource that allows even the smallest app company to contribute to the app ecosystem and compete with tech giants. Unfortunately, this lack of broadband—a phenomenon commonly referred to as the "digital divide"—prevents millions of rural Americans from participating in today's economy. This, in turn, translates to fewer

¹ *In the Matter of Amendment 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*, Microsoft's Petition for Rulemaking, ET Docket No. 14-165 (2019). Available at [https://ecfsapi.fcc.gov/file/1050380945109/White%20Spaces%20Petition%20for%20Rulemaking%20\(May%203%202019\).pdf](https://ecfsapi.fcc.gov/file/1050380945109/White%20Spaces%20Petition%20for%20Rulemaking%20(May%203%202019).pdf). (Microsoft's Petition).

² *In the Matter of Amendment of Part 15 of the Commission's Rules for Unlicensed White Space Devices, et al.*, Report and Order and Order on Reconsideration, ET Docket No. 16-56, et al. (2019). Available at <https://docs.fcc.gov/public/attachments/FCC-19-24A1.pdf>.

customers, opportunities, and employees for developers like us; and fewer services and competitive options for consumers.

The good news is that there is a solution: make TVWS available for unlicensed broadband use. This will ensure that fewer Americans fall on the wrong side of the digital divide. However, we need the FCC to provide regulatory certainty in using these TVWS for that type of unlicensed use. We see the Microsoft petition as a measured approach in getting us closer to that goal by outlining consensus-based and practical solutions for the Commission to consider.

We believe the Microsoft petition accomplishes this goal and moves the needle closer to getting us reliable broadband in our rural areas. It follows that the sooner the Commission moves on the items in the Microsoft Petition, the sooner we can provide our innovative services to rural Americans and hire talent in places that are currently underserved by reliable internet.

We thank you in advance for your time on and consideration of this important topic.

Sincerely,

1564B
BadVR
Cdata Software
Computer Ways
Devscale
Dogtown Media
For All Abilities
Fresco Capital
Kaia Health
Medical Society of Northern Virginia (MSVNA)
Motionmobs
Neuon
Nsoftware
PreEmptive Solutions
Quantified Ag
Rimidi
SentryOne
Sigao Studios
Southern DNA
SPENDiD
TruV Systems
Well Beyond