



October 20, 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, ET Docket No. 20-36*

Dear Ms. Dortch,

ACT | The App Association (the App Association) represents more than 5,000 app makers and connected device companies located across the United States responsible for 5.9 million American jobs that power a global digital economy valued at \$1.7 trillion annually. The App Association supported and continues to support the Commission's efforts to bring better broadband to Americans by reducing regulatory burdens and opening more spectrum. Our membership includes small to medium-sized app developers across all 435 congressional districts, and many of our members live or work in rural areas that traditional networks cannot reach. The App Association has actively advocated for enabling television white spaces (TVWS) operations that will, along with the Commission's work related to wireless infrastructure deployment, allow our small businesses to grow, create, and contribute to local economies.

The App Association applauds the Commission's valiant efforts to bridge the digital divide through its TVWS proceeding. The Commission's advancement of TVWS rules in the above-referenced docket represents a crucial step forward towards providing underserved Americans with much-needed access to broadband to support numerous consumer-facing internet of things (IoT) use cases including working from home, remote healthcare treatments, home education, and others. TVWS are also uniquely positioned to unlock the potential of new enterprise IoT applications in areas such as precision agriculture, among others. The public record, and the Commission's deliberate and thoughtful analysis, categorically support expanded TVWS operations from both policy and engineering perspectives.



As the Commission works to finalize the text of its pending Report & Order before the October 2020 Open Meeting, the App Association urges the Commission to consider further updates based on new testing data demonstrating that higher power TVWS devices can safely operate closer to broadcast channels than currently allowed, including on the first adjacent channel.<sup>1</sup> We support Commission revisions to its Report & Order that would fully capture laboratory measurement and field testing now on the record that will inform future consideration of higher power fixed white space device operation.

The App Association urges for the above-requested changes to be made to the Report & Order before its adoption and again congratulates the Commission on making substantial progress in its TVWS Report & Order. Advancing the TVWS Report & Order will significantly further the Commission's mission of bridging the digital divide in America.

The App Association appreciates the Commission's consistent efforts to bridge the digital divide and consideration of the value of TVWS.

Sincerely,

Brian Scarpelli  
Senior Global Policy Counsel

Belen Crisp  
Policy Associate

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

cc: Chairman Ajit Pai  
Commissioner Michael O'Rielly  
Commissioner Brendan Carr  
Commissioner Jessica Rosenworcel  
Commissioner Geoffrey Starks

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<sup>1</sup> Ex Parte of Microsoft Corporation, ET Docket No. 20-36 (filed October 15, 2020).