

Before the
DEFENSE INFORMATION SYSTEMS AGENCY
U.S. DEPARTMENT OF DEFENSE
Fort Meade, MD 20755

In the Matter of)
)
Request for Information regarding)
Dynamic Spectrum Sharing)

**COMMENTS OF THE
TELECOMMUNICATIONS INDUSTRY ASSOCIATION**

The Telecommunications Industry Association (“TIA”) appreciates the opportunity to provide input from industry regarding the Department of Defense (“DoD” or “Department”), Defense Information Systems Agency’s Request for Information (“RFI”).¹ As both an advocacy organization and a standards-setting body, TIA represents hundreds of global manufacturers and vendors of information and communications technology (“ICT”) equipment and services that are supplied to the owners and operators of communications networks, enabling operations across all segments of the economy. Our member companies design, produce, and sell equipment and services that are utilized in our nationwide legacy and next-generation networks. We welcome the opportunity to discuss the important questions raised by the RFI, particularly those relating to how the Department can utilize 5G networks in their facilities and which other spectrum bands can feasibly be made available for sharing.

¹ Defense Spectrum Sharing Request for Information, Sept. 18, 2020 (“RFI”), available at <https://beta.sam.gov/opp/f88ac11e80bb4e5b8ebb0a30b703eccf/view>.

I. TIA supports the DoD's utilization of 5G technology and equipment in its existing private networks in addition to leveraging commercial 5G solutions.

A. TIA supports DoD investment in 5G technologies to bring next-generation networks into their bases and facilities.

TIA's members have long supported public-private partnerships and work with government partners on research and development projects. As recently as June of this year, in TIA's comments in response to National Telecommunications and Information Administration's Request for Comment on the National Strategy to Secure 5G, TIA advocated for the U.S. government to engage in additional research and development projects and 5G use cases with ICT industry partners.² As TIA explained in those comments, the ICT industry partners building the global 5G networks are engaged in numerous research and development projects focusing on the many use cases that can be addressed by 5G. TIA urged the U.S. government to be active in working with industry and participating in research and development projects, and provided an illustrative list of some efforts in which the Administration could consider participating, including cost-effective ways to make spectrum sharing more efficient without causing additional interference.³ TIA also encouraged the government to partner with industry to identify areas where generating public-private use cases could inform positive changes that 5G growth will promote.⁴

TIA continues to encourage the Department to identify ways to work with ICT manufacturers on how to use the Department's existing private networks as a vehicle to bring 5G speeds to DoD's facilities. The Department, working with ICT manufacturers and vendors, can

² Comments of the Telecommunications Industry Association, National Telecommunications and Information Administration (NTIA), Docket No. 200521-0144, at 22-23 (filed June 25, 2020).

³ *Id.*

⁴ *Id.* at 23.

utilize their existing private infrastructure or the inclusion of new private broadband networks to connect their facilities in a secure and efficient manner. In addition, the Department could combine investment into existing or new DoD private networks where possible while leveraging commercial 5G networks in order to increase the efficiency of deploying 5G across DOD's facilities. This would allow DoD to benefit from the economies of scale of commercial networks as well as allow for more ubiquitous coverage and greater capabilities for their facilities.

B. TIA does not interpret the RFI as a call for comment on a public-run DoD nationwide 5G network, which we would oppose.

The ICT industry has invested billions of dollars in order to create national, commercial 5G networks. TIA does not support undercutting this massive investment by introducing a government-owned public network that would essentially give away spectrum for free. TIA agrees with leading government experts who have come out against such a notion. For instance, Federal Communications Commission Chairman Ajit Pai has opposed “any proposal for the federal government to build and operate a nationwide 5G network....What government can and should do is push spectrum into the commercial marketplace and set rules that encourage the private sector to develop and deploy next-generation infrastructure.”⁵ Similarly, Senator John Thune, along with 18 other Senators, last month urged the President to bolster private-sector deployment of 5G, emphasizing that “[t]he United States won the global 4G race because we empowered the private sector to build multiple competitive 4G networks... Nationalizing 5G and experimenting with untested models for 5G deployment is not the way the United States will win the 5G race.”⁶ The negative response to a nationalized 5G network has been bipartisan, with

⁵ Statement of FCC Chairman Ajit Pai on the Future of 5G, Jan. 29, 2018, available at <https://www.fcc.gov/about/leadership/ajit-pai#statements>.

⁶ Sept. 30, 2020 Letter from Senators Thune, Barrasso, Blackburn, Boozman, Capito, Cornyn, Cotton, Cramer, Cruz, Daines, Gardner, Johnson, Lee, Moran, Roberts, Rubio, Scott, Sullivan, and Young to

House Energy and Commerce Chairman Frank Pallone saying, in a joint statement with Communications and Technology Subcommittee Chairman Mike Doyle, that “the creation of a government-owned and operated 5G network will do nothing but slow the deployment of this critical technology.”⁷ TIA agrees with these experts, as well as the numerous industry groups who have come out against the idea of a public-run network, and urges the Department to instead focus on investing in existing options to bring next-generation networks to their facilities.

II. TIA supports the creation of a working group of technical experts from the DoD and the ICT industry to examine the feasibility of further spectrum sharing.

To explore the issues raised in the RFI, TIA would support the establishment of an industry-DoD working group to analyze spectrum sharing between DoD incumbents and industry. TIA encourages public-private partnerships where appropriate, and we believe that identifying ways to share spectrum between Federal agencies and the wireless industry is certainly one of those areas.

We recommend that this working group should look at more than just re-allocation, and should focus as well on how Government can share spectrum in an efficient and safe manner. To carry out this charge, the group would need to be composed of technical experts from both wireless and defense technology providers (e.g., wireless and radar industry Original Equipment Manufacturers) along with DoD operational teams. The group would have to be empowered to do technical deep-dives on the feasibility of sharing on spectrum bands, which could require Non-Disclosure Agreements and potentially even security clearances. And while we recognize

President Donald J. Trump, available at https://www.thune.senate.gov/public/_cache/files/b38cc513-e694-461e-b52c-8454ff8f1726/67C00068B5E4353BFFD8E3548F61C8E9.9.30.20-potus-dod-rfi-letter.pdf.

⁷ Press Release by Rep. Pallone and Doyle, *Pallone & Doyle on DOD’S Request for Information on Creating a Government Owned 5G Network*, Sep. 21, 2020, available at <https://energycommerce.house.gov/newsroom/press-releases/pallone-doyle-on-dod-s-request-for-information-on-creating-a-government>.

that transparency is always important, the group would have to be able to work at times in a closed setting where technical and proprietary data can be securely shared by experts in order to determine what is technically feasible with regards to sharing for each band.

Creating a group of experts equipped with these necessary safeguards will allow an in-depth examination of use on existing bands to determine where sharing is feasible. Industry needs to be able to work with U.S. government incumbents to determine the most efficient and effective spectrum sharing methodologies and the extent to which there is spectrum that is currently underutilized by government incumbents. There may, for instance, be cases similar to CBRS, where spectrum was largely unused outside of coastal cities. There may also be bands that are fully occupied only some of the time, or bands that face different demands in different geographic locations. Once the working group has reached a conclusion on the feasibility of sharing on any given band, it should issue a recommendation to DoD and other government stakeholders, such as NTIA, along with seeking broader input from the ICT industry, on how a sharing agreement could be efficiently and securely reached.

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TIA appreciates the opportunity to provide these comments in response to the RFI, and we welcome further discussion on these important issues.

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