



June 2, 2020

In the Matter of Unlicensed White Space Device Operations in the Television Bands
RE: FCC Proposes Updating White Spaces Rules to Expand Rural Connectivity
DA/FCC #: FCC-20-17; Docket/RM: 20-36; FRS

Chairman Ajit Pai
*Federal Communications
Commission*
445 12th Street, SW
Washington, DC 20554

**The Honorable Jessica
Rosenworcel**
*FCC Commissioner Federal
Communications Commission*
445 12th Street, SW
Washington, DC 20554

The Honorable Michael O’Rielly
*FCC Commissioner
Federal Communications
Commission*
445 12th Street, SW
Washington, DC 20554

The Honorable Geoffrey Starks
*FCC Commissioner
Federal Communications
Commission*
445 12th Street, SW
Washington, DC 20554

The Honorable Brendan Carr
*FCC Commissioner Federal
Communications Commission*
445 12th Street, SW
Washington, DC 20554

**Dear Chairman Pai, Commissioner O’Rielly, Commissioner Carr,
Commissioner Rosenworcel, and Commissioner Starks:**

As business members of Voices for Innovation, we write to voice our strong support for the Federal Communications Commission’s (FCC) proposal to revise TV white spaces (TVWS) rules to spur deployment of wireless broadband technologies that will expand the availability of reliable, affordable internet across America, especially in rural communities.

The COVID-19 pandemic has underscored the importance of internet access for all Americans. It is a critical lifeline that enables remote access to employment; medical care and information; government services; shopping; and education for students learning from home. Widely available internet will be just as important as we recover from this historic event. For these reasons, it is critical for the proposed rules to be finalized as quickly as possible, and no later than the end of 2020.

We recognize that several government initiatives and a range of technologies are now helping to close our nation’s digital divide. Expanded authorization for white spaces operations will be an important option where other technologies are impractical or cost prohibitive.



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We support adopting all of the FCC's proposals including increasing power and antenna height, and enabling IoT and connected vehicles. We want to especially underscore our support for authorizing TVWS operations on first-adjacent channels to broadcast operations, with appropriate safeguards to prevent interference. As we understand, substantial testing has demonstrated that adjacent channel use, with safeguards in place, will not disrupt broadcasts. This rule is essential to enable robust use of white spaces broadband by rural ISPs.

Thank you for your consideration of our views. We look forward to seeing the FCC continue to make progress on this issue.

Sincerely,

Alan Helbush

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Newark, CA*

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