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April 17, 2023

National Telecommunications and Information Administration, Department of Commerce
1401 Constitution Ave., NW
Washington, DC 20230

Re: Development of a National Spectrum Strategy, Docket No. 230308–0068

Dear NTIA:

The Multicultural Media, Telecom and Internet Council (MMTC) respectfully submits this response to NTIA's request for comments regarding the development of a National Spectrum Strategy. MMTC has long been a strong advocate of bridging the digital divide for communities of color and other underrepresented groups, and we appreciate NTIA's attention to wireless technology's important role in the lives of millions across the nation. In particular, NTIA's RFC recognizes the benefits of wireless connectivity for the American people. It highlighted how wireless can help further diversity, equity, and inclusion, create high-paying and highly skilled jobs, and improve overall quality of life. MMTC also highlighted these benefits and others in the attached report, *Wireless in Communities of Color: Bridging the Digital Divide*.

MMTC supports the three pillars NTIA outlined in its RFC: creating a spectrum pipeline, conducting long-term spectrum planning, and facilitating unprecedented spectrum access and management through technology development. These steps are essential in ensuring the U.S. can support the increasing demand for wireless services, driving greater efficiencies that lower costs and thus lowering barriers to connectivity for underserved communities.

A core goal of the National Spectrum Strategy should be to help meet the increasing demand for commercial wireless services by making available additional spectrum for licensed use, which will further our nation's efforts toward a future where every community, family, and child has access.

Access to Wireless Connectivity Is Essential for Communities of Color

Access to reliable, affordable high-speed internet uplifts our communities in a multitude of ways, opening doors that lead to improved opportunities for education, jobs, healthcare, community engagement, economic empowerment, and much more.

For years, wireless has been an essential means for communities of color to connect and communicate, as discussed in the attached report. These communities span financial demographics, urban and rural areas, young children and the elderly, immigrants, transient households, and many others—large parts of the tapestry that is America. The report highlights why and how wireless is closing the digital divide, how it improves lives for many communities, and the new wireless-enabled innovations that are reshaping society.

Since at least 2011, when Pew began tracking and reporting in this area, communities of color have over-indexed in wireless adoption due to its mobility, affordability, and flexibility. That year, wireless internet use was nearly equal for African Americans, Latinos, and whites, with usage rates between 62 and 63 percent for all three groups—and at the same time, about 50 percent more African Americans and Latinos owned smartphones than whites.

Today, wireless internet connects more previously unserved and underserved groups than ever before—91 percent of adults in the U.S. are now connected to wired or wireless broadband, and 85 percent own a smartphone. About 15 percent of adults solely use their smartphones for broadband internet access, and this number increases to 25 percent for Latino and 17 percent for African American adults.

Latinos and Asian American and Pacific Islander communities are the fastest growing demographic groups in the country—and along with African Americans, these communities already rely heavily on wireless and will be most impacted by network congestion and reliability issues in the face of a spectrum crunch.

A Balanced Spectrum Strategy Is Needed to Ensure Every American Gets Connected

MMTC supports a balanced spectrum strategy that supports the various on-ramps to the internet leveraged by historically unserved and underserved communities, as well as the important government missions that rely on spectrum. The evidence indicates a balanced approach calls for more licensed spectrum for commercial wireless service.

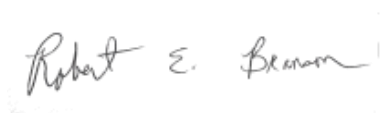
A recent Recon Analytics report found that since 2012, wireless providers “reported a 3543% increase in mobile data traffic against at 117% increase in the amount of low- and mid-band spectrum available to meet that demand.” Beginning in 2020, the COVID-19 pandemic reinforced the importance of mobile connections for families that needed to learn, work, visit their healthcare providers, connect with family members, and engage with civic services, but often lacked a home broadband connection. Ericsson estimates that mobile data use will further *quintuple* to 240 trillion megabytes per year by 2027, as 5G drives a massive increase in the number of wirelessly connected devices.

The National Spectrum Strategy should focus on meeting these trends with the needed resources. Unfortunately, all we have today is an empty spectrum pipeline and the expiration of the FCC’s auction authority.

More Licensed Spectrum Is Needed

Policymakers should aim to achieve a balanced approach to spectrum allocation. Today this means making more spectrum available for licensed use and creating a spectrum pipeline so we can meet future demand. NTIA, in its work toward the development of a National Spectrum Strategy and attention to wireless as a major driver of connectivity and innovation, is taking a much-needed step in the right direction. As the agency moves forward in collaboration with the FCC, it is vital to ensure our nation’s unserved and underserved communities aren’t left behind—and a balanced spectrum pipeline that includes wide bands for licensed use is the best approach.

Sincerely,



Robert E. Branson, Esq.
President and CEO

MMTC is the technology, media, and telecommunications industries’ leading non-partisan, national nonprofit diversity organization. Since its inception in 1986, MMTC has worked tirelessly to promote and preserve equal opportunity, civil rights, and social justice in the mass media, telecommunications, and broadband industries, and to close the digital divide on behalf of its members and constituents, including owners of radio and television broadcast stations, programmers, prospective station owners, and others involved in the technology, media, and telecommunications industries. One of MMTC’s “core issue areas” focuses on infrastructure, connectivity, and digital inclusion.