

15 April 2014

The Honorable Fred Upton
Chairman
House Energy & Commerce Committee
2183 Rayburn House Office Building
Washington, DC 20515

The Honorable Henry Waxman
Ranking Member
House Energy & Commerce Committee
2204 Rayburn House Office Building
Washington, DC 20515

Dear Chairman Upton and Ranking Member Waxman:

On behalf of the 205,000 members of IEEE in the United States, IEEE-USA is pleased to respond to your April 1, 2014 request for comments on US spectrum policy.

We are attaching two public documents on key issues of spectrum policy. These documents are intended to be both nonpartisan and industry neutral with respect to spectrum access. The basic problems of spectrum policy discussed here have developed over a long time under administrations of both parties.

The first document, **“Position Statement on Improving U.S. Spectrum Policy Deliberations in the Period 2013-2017”** (also available at <https://www.ieeeusa.org/policy/positions/SpectrumPoilcy1112.pdf>) gives 10 specific suggestions in the following three categories:

- Process Improvement
- Improved technical resources for FCC and NTIA to improve decision making
- Other Issues to Stimulate Innovation

Many of these recommendations could be done within existing legislation. Some require additional funding. While we recognize that increased funding is hard to find at the moment, the present funding levels of the spectrum activities at NTIA and FCC are negligible compared to the economic activity encouraged by these programs. Increased funding of a few additional million dollars per year would be vastly offset by the increased economic activities and innovation these investments would encourage. We also note that the spectrum management activities of NTIA and FCC are both mainly financed through user fees - not general tax revenue.

The second document, “**Clarifying Harmful Interference Will Facilitate Wireless Innovation**” (also available at <http://www.ieeeusa.org/policy/whitepapers/IEEEUSAWP-HarmfulInterference0712.pdf>) explains how the concept of 'harmful interference', key to many spectrum policy decisions, is poorly defined considering modern technology. While a redefinition would be impractical for many reasons, FCC and NTIA could significantly improve both the transparency and speed of many spectrum policy decisions simply by clarifying some or all of these 6 issues discussed in the white paper:

- I/S Protection at Receiver
- I/S Power Flux Density at the Antenna or I/S Power at the Receiver
- Propagation Models
- MCL Vice Stochastic Modeling
- Minimum Protection Distance
- Acceptable Interference Statistics

We believe that such clarifications would decrease the present regulatory uncertainties associated with wireless technology development and improve US competitiveness in emerging wireless technologies while assuring incumbent users about their actual spectrum rights.

IEEE-USA is an organizational unit of the Institute of Electrical and Electronics Engineers, Inc. (IEEE), the world’s largest organization for technical professionals, and a leading educational and scientific association for the advancement of technology. IEEE-USA fosters technological innovation for the benefit of all, including more than 205,000 U.S. engineers, scientists, and allied professionals who are members of the IEEE. Members of our Communications Policy Committee include professionals working in industry, academia and government and bring with them decades of direct, first-hand experience working on spectrum-related issues.

We appreciate the Committee’s willingness to tackle these important issues. Spectrum policy is vitally important to the health of our nation’s economy and we commend you for addressing current shortcomings. We look forward to working with you on these issues in the future. Please contact Russ Harrison at either (202) 530-8326 or r.t.harrison@ieee.org if you have any questions or need more information.

Thank you.

Sincerely,



Gary L. Blank
2014 IEEE-USA President

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