

April 22, 2020

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th Street, S.W.  
Washington, DC 20554

Docket 20-36

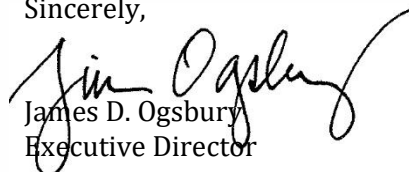
Dear Secretary Dortch:

The Western Governors' Association (WGA) appreciates the opportunity to provide comments on the Federal Communications Commission's Notice of Proposed Rulemaking (NPRM) on "Unlicensed White Space Device Operations in the Television Bands." In previous correspondence to the Commission (attached), WGA has highlighted the benefits of TV White Spaces (TVWS) technologies as a connectivity solution for rural communities.

The NPRM considers several technical proposals to improve the utility of TVWS devices in rural areas. These include higher allowable transmit power and antenna height for fixed TVWS devices in "less congested" areas. WGA supports these proposed updates as they will enable TVWS technologies to offer improved broadband coverage in rural communities.

WGA appreciates the Commission's efforts to support creative broadband connectivity strategies in rural areas. We encourage you to utilize the expertise of Governors and state broadband offices as you consider and implement the changes proposed in the NRPM.

Sincerely,



James D. Ogsbury  
Executive Director



DENNIS DAUGAARD  
GOVERNOR OF SOUTH DAKOTA  
CHAIR

DAVID IGE  
GOVERNOR OF HAWAII  
VICE CHAIR

JAMES D. OGSBURY  
EXECUTIVE DIRECTOR

April 24, 2018

Honorable Ajit Pai  
Chairman  
Federal Communications Commission  
445 12th Street, S.W.  
Washington, D.C. 20554

Dear Chairman Pai:

Western Governors appreciate the President's goal of expanding connectivity for rural Americans as described in the Executive Order, "Streamlining and Expediting Requests to Locate Broadband Facilities in Rural America." We see the Federal Communication Commission's efforts to improve rural broadband access as crucial in achieving those goals.

Many western communities lack access to broadband internet due to the high cost of infrastructure and the low number of customers in potential service areas. This has left many rural businesses at a competitive disadvantage and citizens without access to telework, telemedicine, and distance learning opportunities.

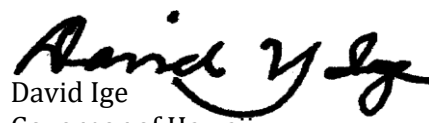
Western Governors support not only expansion of broadband capacity where economically feasible, but also the use of innovative technologies that have the potential to deliver reliable internet access at lower costs than traditional broadband infrastructure. TV White Spaces (TVWS) technology represents one possible mechanism to achieve that goal. TVWS technology may be well suited for deployment in some rural areas due to its low-cost infrastructure requirements and ability to transmit signals over long distances and through rugged terrain. Pilot projects in 13 states – including Arizona, Montana, North Dakota, South Dakota, and Washington – will help determine the viability of TVWS technology in rural areas.

The long-term success of TVWS technology relies on consistent access to spectrum. We ask that adequate spectrum capacity be reserved for unlicensed use to support the growth of TVWS technology in rural communities.

Broadband internet connectivity is the critical infrastructure of the 21<sup>st</sup> century and is a necessity for businesses, individuals, schools and government. We look forward to working with you to assure that rural America shares in the economic, medical, and educational benefits that will result from expanded access.

Sincerely,

  
Dennis Daugaard  
Governor of South Dakota  
Chair, WGA

  
David Ige  
Governor of Hawaii  
Vice Chair, WGA

*Identical letters sent to Commissioners Clyburn, O'Rielly, Carr and Rosenworcel*

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