

July 22, 2022

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Jessica Rosenworcel
Chair
Federal Communications Commission
45 L Street NE
Washington, DC 20554

Chair Rosenworcel:

I would like to bring your attention to concerns which have been raised related to an ongoing proceeding at the Federal Communications Commission (FCC) that could potentially impact hundreds of households in my district. The issue is regarding critical telecommunications services for millions of Americans, which are currently provided through a specific band of spectrum known as “the 12 GHz band”. The 12 GHz proceeding (Docket 20-443, “Expanding Flexible Use of the 12.2-12.7 GHz Band”) was started in January of 2021, under the Trump administration, and has caused concern among current users of the band due to the likely interference should the FCC move forward.

California faces challenges with rolling out high-speed internet in rural areas and ensuring that all residents have options when it comes to modern technologies. Rural areas throughout the country, including in areas of my district in coastal Northern California, have been historically underserved, or even unserved entirely, by traditional telecommunications infrastructure. Access to high-speed internet is no longer a “nice to have” feature for households - it is an essential part of accessing things like modern healthcare, business services, and remote education. Protecting these benefits was a key component of the FCC’s announcement of the Notice of Proposed Rulemaking in 2021.

The FCC placed two strict requirements on the petitioners seeking new rights in the band: first, propose specific technical parameters for the new technologies they would like to deploy; second, demonstrate that non-interference with current systems is possible. The record clearly indicates that neither of these conditions has been met. As the petitioners’ own filings state, “[C]oncurrent sharing of spectrum between co-primary 5G and NGSO FSS operations is not

viable in the 12 GHz Band.”¹ Furthermore, a technical analysis concluded recently that approximately 75 percent of current Starlink users will face a loss of service if the FCC approves the petitioners’ request.²

I request that you give full and fair consideration to any potential harm before acting on this proceeding. Thank you for your efforts in California and the nation to bring modern services to underserved areas, and I look forward to your response. Should you have any questions about this request, please contact Casey MacLean on my staff at Casey.MacLean@mail.house.gov.

Sincerely,

A handwritten signature in blue ink, appearing to read "Jared Huffman", with a long horizontal flourish extending to the right.

Jared Huffman
Member of Congress

¹ Letter from Alison Minea to Marlene H. Dortch, IBFS File No. SAT-MOD-20180319-00022 and Docket No. RM-11768, at 3 (Dec. 2, 2019).

² SpaceX Analysis of the Effect of Terrestrial Mobile Deployment on NGSO FSS Downlink Operations. Available at https://api.starlink.com/public-files/12GHzInterferenceStudy_062022.pdf (June 21, 2022).