



TOM O'HALLERAN

1ST DISTRICT, ARIZONA

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July 13, 2022

The Honorable Jessica Rosenworcel
Chairwoman
Federal Communications Commission
45 L Street NE
Washington, DC 20554

Chairwoman Rosenworcel,

I write regarding an ongoing proceeding (Docket 20-443, "Expanding Flexible Use of the 12.2-12.7 GHz Band") at the Federal Communications Commission (FCC). This proceeding, which began over a year ago, could disrupt critical services in many remote and rural areas of the United States, including in Arizona's First District. I urge the FCC to not move forward with any potential changes to this critical band unless non-interference can be proven for the millions of people who currently rely on the band.

Next-generation satellite systems rely on the 12 GHz band to connect with users all over the world. The benefit of these next-generation systems was made evident recently, when an outage in traditional broadband infrastructure in Navajo County, Arizona, and Apache County, Arizona caused residents to lose access to their phone service, including their ability to call 911 or even use their cell phones. This happened in addition to broadband service going down. During this outage, next-generation satellite internet was able to provide service to local government officials and provided critical connections for rural Americans. As climate change drives more frequent and intense disruptions to power generation and transmission systems, including wildfires and extreme temperatures, Americans need all the tools at our disposal to respond and recover, including easily deployable satellite internet systems.

In addition to the ability to provide service when terrestrial systems are disrupted, next-generation satellite networks are also uniquely suited to provide access in remote and difficult to serve areas. In a state like Arizona, with rural and tribal populations interspersed across challenging terrain, next-generation satellite-based internet is helping to close the digital divide. In the last few years, members of the Hopi Tribe, Navajo Nation, and the San Juan Southern Paiute Tribe have benefitted from partnerships to bring high-speed satellite-based internet to their communities. These

partnerships and new technologies are critically important for low-income students, who faced incredible hardships during the pandemic.

This technology holds significant promise for closing the digital divide in the most remote areas and considering changes that would harm current users of these services is unacceptable. At the outset of the current proceeding, the FCC required the petitioners asking for new rights in the 12 GHz band to propose specific technical parameters for the new technologies they propose to deploy. These technical parameters have not been provided. They were also required to demonstrate that non-interference with current systems was possible, which, as the petitioners' own studies admit, is not the case. Additionally, new technical analyses show that 75 percent of current Starlink users will face a loss of service if the FCC approves the petitioners' request.¹ Continuing the proceeding and risking harm to consumers and loss of service is counter to the goals of universal service and acting in the public interest. I urge the FCC to close the proceeding, as the requirements for non-interference on the 12 GHz band have not been met.

Thank you for your continued work to close the digital divide and for consideration of this request in accordance with all applicable rules, regulations, laws, and guidelines. I look forward to continuing our work together and to your response.

Sincerely,



Tom O'Halleran
Member of Congress

¹ 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).