

**STATEMENT OF  
COMMISSIONER GEOFFREY STARKS**

Re: *Expanding Use of the 12.7-13.25 GHz Band for Mobile Broadband or Other Expanded Use*, GN Docket No. 22-352, Notice of Inquiry and Order (Oct. 27, 2022)

I [said it](#) ahead of the Americas Spectrum Management Conference, and I'll say it again now. Opening up new frequency bands isn't just good telecom policy. It's essential economic policy—and an absolute prerequisite to our continued push for innovation.

That's why I support our inquiry into the 12.7 GHz band. In many ways, this band is a clear candidate for more intensive use. It's big—550 megahertz is a lot of spectrum—and it already has a primary mobile allocation. It also has important incumbents whose needs we must address, but whose combined use of the band—across dimensions of space, time, and frequency—screams opportunity.

To be sure, 12.7 GHz veers toward the higher end of mid-band, and we should be clear-eyed about what the physics tells us about how the band will be used. But when you consider the overall balance in terms of propagation, penetration, capacity, and potential for reuse—and sharing—it's clear that this spectrum could meet the mark for a variety of valuable wireless deployments. There's no use in waiting to explore how best to unlock those opportunities, even as we, along with the Congress and other federal agencies, also consider opportunities in the lower end of mid-band. We can and must do both. Fortunately, we can walk and chew gum better than the best of them.

Finally, I'm pleased that we're keeping an open mind about how to maximize innovation and deployment if we repurpose this band. The NOI appropriately seeks comment on exclusive licensing with relocation, and potential sharing opportunities, both between incumbents and new services and among new services themselves. That is the right call at this stage of the proceeding. What's best in one band may not be best for another, so we're right to develop as complete a record as possible on these key points. I look forward to reviewing the record on questions like anticipated applications and their performance needs, opportunities for global harmonization, and the feasibility of specific sharing mechanisms in light of new and incumbent uses and the band's inherent physical characteristics.

I am grateful to the Commission staff who developed this item, and it has my full support.