

**STATEMENT OF
COMMISSIONER NATHAN SIMINGTON
CONCURRING**

Re: *Establishing a 5G Fund for Rural America*, GN Docket No. 20-32

I have been extremely supportive of 5G as a Commissioner. I am enthusiastic about the advanced network engineering that it enables and especially about what it can do for specialized use cases like high-tech manufacturing and precision agriculture. And without a doubt, 5G is the gold standard for new mobile broadband deployment. Except for special circumstances, the FCC should not be paying for the deployment of previous generation mobile technologies at this point. But I am also aware that, especially in low density rural areas, 5G does not represent a transformational change for end-consumer mobile broadband service. In fact, 5G service in those areas operates on similar bands, at similar speeds, and with similar performance characteristics as 4G LTE service.

So when we are deciding where to spend limited funds to subsidize the deployment of 5G, it is obvious to me that we should prioritize areas that do not even have 4G service to speak of before we start paying for upgrades from 4G to 5G. And that is in fact how our rules, adopted in 2020, say the 5G Fund should work.

Unfortunately, this item seeks to upend that decision. The draft version outright proposed that we treat areas with existing 4G service as being exactly the same as areas with no service at all when it comes to qualifying for 5G Fund subsidies. I was disappointed that the Chairwoman's office was unwilling to accommodate my simple request that the item seek comment on the relative benefit to end-consumers of going from 4G to 5G versus going from no service at all to 5G, given that 4G and 5G are likely to offer similar speeds in these areas. The refusal to confront this glaring issue head-on is concerning.

Because the Chairwoman's office did downgrade this wrongheaded idea from an official proposal to just something we are seeking comment on, I am able to concur on passage of this item in the interests of getting more public input on the issue, but I will be watching this proceeding closely. Like then-Commissioner Rosenworcel said in her statement on our 2020 5G Fund order, "These are not communities without 5G, they are communities with no G." Her office may now be inclined to leave those no G communities behind, but I am not.