

March 31, 2025

The Honorable Howard Lutnick  
Secretary  
U.S. Department of Commerce  
1401 Constitution Ave NW  
Washington, D.C. 20230

Dear Secretary Lutnick,

Our companies and organizations write to express our strong support for preserving the fundamental aspects of the 3.5 GHz Citizens Broadband Radio Service (“CBRS”) band. CBRS is a shining example of U.S. leadership and innovation, proving that dynamic spectrum sharing between federal and commercial entities works, enabling a broad range of innovative wireless services and use cases, and positioning America as the clear global leader in private wireless networks.

Due to the diligent collaboration between the National Telecommunications and Information Administration (“NTIA”) within your department, the Federal Communications Commission (“FCC”), the Department of Defense (“DOD”), and industry, the CBRS sharing framework has proven so effective that in the over five years of commercial operations in the band not a single instance of harmful interference to the incumbent DOD systems in the band has been reported. And CBRS required no relocation or modification of these DOD systems. In fact, these government agencies and industry conducted a thorough review early last year of the CBRS experience thus far and collectively agreed to refinements to the DOD protection criteria that have significantly improved commercial services in the band.

The lower-power, localized nature of CBRS spectrum, coupled with options for both protected access with Priority Access Licenses (“PALs”) or opportunistic access at the General Authorized Access (“GAA”) tier, has resulted in widespread adoption across a range of use cases and applications. CBRS spectrum has been the key enabler of deployments for advanced manufacturing (semiconductors, electric vehicles and other automobiles, agricultural equipment, wireless systems, etc.), industrial and enterprise private networks, transportation and logistics connectivity (e.g., airports and shipping terminals), the U.S. military, rural broadband, competitive mobile services, school and library access, large public venues and sporting events, healthcare and more. Of course, mobile operators utilize CBRS spectrum as well, with Verizon being the largest purchaser of CBRS licenses. Some key CBRS statistics from the latest NTIA report<sup>1</sup> covering April 2021 thru July 2024 include the following:

- Since the Trump Administration’s late 2020 CBRS auction, well over 400,000 CBRS Base Stations have been installed (more than ALL of the of macro cellular sites in the U.S. combined), with over 1,000 entities actively using CBRS spectrum today.
- CBRS is utilized in nearly 83% of all counties in the United States.

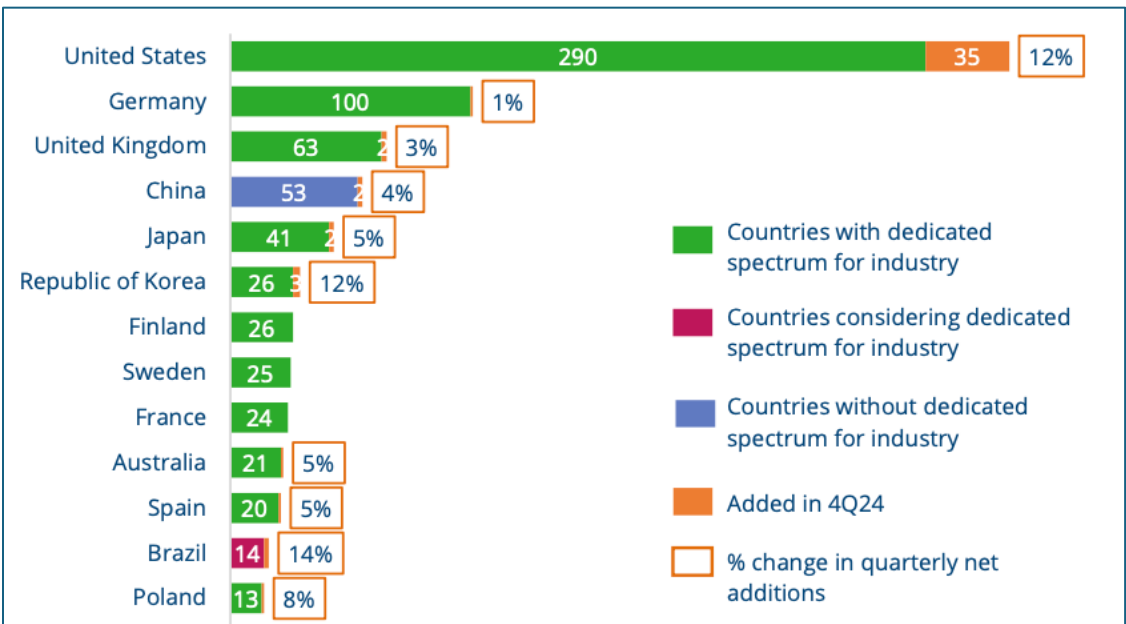
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<sup>1</sup> D. Boulware, A. Romaniello, *An Analysis of Aggregate CBRS SAS Data from April 2021 to July 2024*, NTIA Report 25-575, U.S. Department of Commerce, National Telecommunications and Information Administration, Institute for Telecommunication Sciences (Nov. 2024) (NTIA Technical Report).

- This exponential growth has been accomplished overwhelmingly through private investment, without the support of government subsidy programs.

CBRS, built largely by U.S. companies using U.S. products, has positioned the U.S. as the global leader in private wireless networks (5G and LTE networks deployed by industries and enterprise companies for internal connectivity needs). In this way, CBRS exemplifies your priority of making spectrum available for American businesses. The investments made in these private networks are one of the strongest growth areas in wireless, with the sector on track for annual growth of 20% through 2027.<sup>2</sup> The Global mobile Suppliers Association (“GSA”) publishes a periodic report on Private Mobile Networks. In the latest report<sup>3</sup> (February 2025), the GSA noted that CBRS was both the most widely used and fastest growing band globally for private mobile network deployments.

This has established the U.S. as the world leader in the fast-growing market for private networks, far exceeding other countries like China, as shown in the following chart from the report:



As your department evaluates our nation’s spectrum needs across federal and commercial uses, we urge you to maintain and protect the existing CBRS framework and the carefully selected and mutually agreed technical parameters that enable sharing. CBRS has proven successful, typifies American technology leadership, and can serve as the foundation for future federal/commercial spectrum sharing.

<sup>2</sup> *The Private LTE & 5G Network Ecosystem: 2024 – 2030 – Opportunities, Challenges, Strategies, Industry Verticals & Forecasts*, SNS Telecom & IT, (Nov. 2024).

<sup>3</sup> *Private Mobile Networks Summary Report*, Global mobile Suppliers Association, (Feb. 2025).

Very respectfully,

Access Humboldt	Barich, Inc.
Benton Institute for Broadband & Society	Cambium Networks
Celona, Inc.	Charter Communications, Inc.
Comcast Corporation	Consumer Action for a Strong Economy (CASE)
Cox Communications	Digital Global Systems
Dynamic Spectrum Alliance	Hewlett Packard Enterprise
Imagine Wireless	Innovation Economy Alliance
Institute for Policy Innovation	JMA Wireless
Mediacom Communications Corporation	Midcontinent Communications
NCTA – The Internet & Television Association	Nextlink Internet
Open Technology Institute at New America	Public Knowledge
The Schools, Health, & Libraries Broadband (SHLB) Coalition	Spectrum for the Future
Syracuse University	Tarana Wireless
U.S. Black Chambers, Inc.	United States Hispanic Chamber of Commerce (USHCC)
WISPA – The Association for Broadband without Boundaries	

CC: Mr. Adam Cassady, Acting Assistant Secretary of Commerce for Communications and Information and Acting NTIA Administrator