

May 13, 2025

The Honorable Brett Guthrie  
Chairman  
House Committee on Energy and Commerce  
2125 Rayburn House Office Building  
Washington, DC 20515

The Honorable Frank Pallone, Jr.  
Ranking Member  
House Committee on Energy and Commerce  
2322 Rayburn House Office Building  
Washington, DC 20515

The Honorable Richard Hudson  
Chairman  
Subcommittee on Communications and Technology  
House Committee on Energy and Commerce  
2125 Rayburn House Office Building  
Washington, DC 20515

The Honorable Doris Matsui  
Ranking Member  
Subcommittee on Communications and Technology  
House Committee on Energy and Commerce  
2322 Rayburn House Office Building  
Washington, DC 20515

Dear Chairmen Guthrie and Hudson and Ranking Members Pallone and Matsui:

Our companies and organizations write to respectfully urge you to remove the 3.5 GHz Citizens Broadband Radio Service ("CBRS") band from the general spectrum auction authority legislation now before the Committee.

Taking away these licenses and the ability to use the band—to hand it to many direct or indirect competitors—would materially undermine our businesses and organizations, including, among others:

- American technology equipment manufacturers fighting for market share against the Chinese Communist Party (CCP),
- Domestic manufacturers of products used by American industry and American farmers,
- Competitive mobile providers, and
- Wireless internet service providers serving the hardest-to-reach corners of the country.

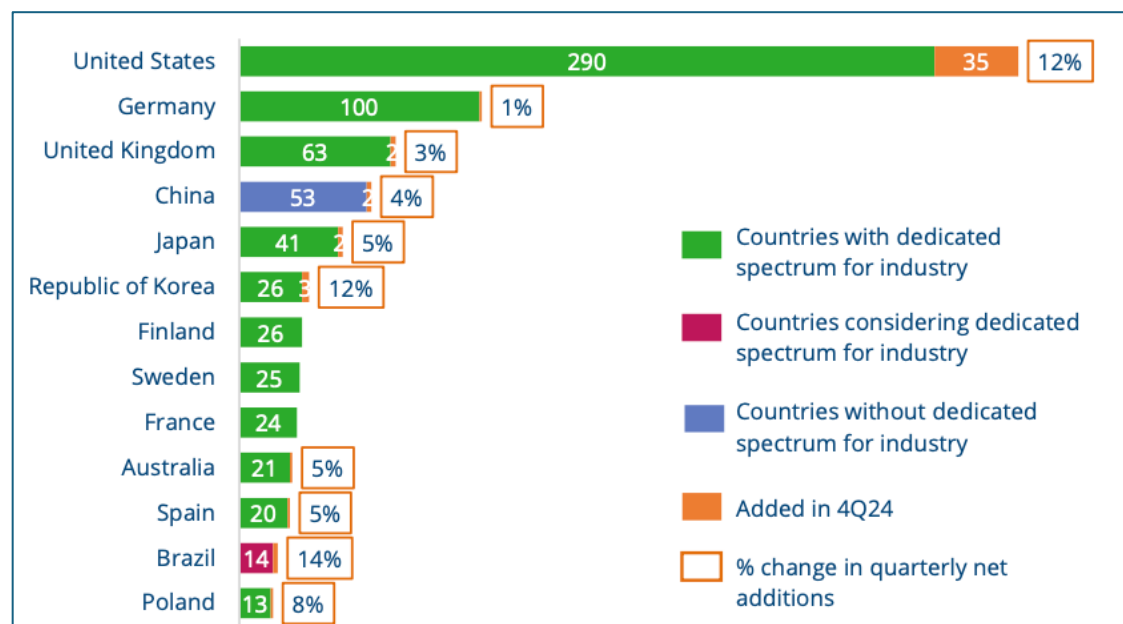
CBRS is not "surplus" spectrum; it is an American success story that is powering Open Radio Access Networks (ORAN) and, by doing so, helping the United States counter equipment

vendors closely aligned with the Chinese Communist Party (CCP), including Huawei and ZTE. Reauctioning or otherwise unsettling the CBRS framework will jeopardize our progress, erode private investment, and hand a strategic advantage to our global competitors.

**CBRS demonstrates that sharing between federal and commercial users works brilliantly—and allowing the band to be reauctioned would fundamentally undermine the future of spectrum sharing technology.** Thanks to the collaboration of the National Telecommunications and Information Administration (NTIA), the Federal Communications Commission (FCC), the Department of Defense (DoD), and industry, the CBRS sharing architecture has operated for more than five years without a single verified instance of harmful interference to DoD incumbents, and without requiring the relocation or modification of DoD systems. Refinements jointly adopted last year have further improved both national security protections and commercial performance.

**The CBRS Band is the launchpad for ORAN leadership.** Because CBRS equipment is often used in connection with open interfaces, U.S. firms ranging from large carriers to startups have been able to deploy, test, and perfect ORAN solutions at massive scale. These field-tested, standards-based products offer a trusted alternative to Huawei and ZTE gear, creating a more secure supply chain for allies and partners and reinforcing bipartisan efforts to blunt CCP influence in global 5G markets.

Our companies have 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:



### **CBRS is already delivering extraordinary economic and strategic returns:**

- More than 400,000 CBRS base stations have been installed—equivalent to the total number of U.S. macro cellular sites—serving over 1,000 diverse licensees and operators.
- CBRS deployments now touch 83 percent of U.S. counties and span sectors such as advanced manufacturing, logistics, healthcare, education, large venues, rural broadband, and DoD training ranges.
- Adoption has been driven almost entirely by private capital, not federal subsidy, and analysts project the private network market will grow 20 percent annually through 2027.
- According to the February 2025 Global mobile Suppliers Association (GSA) report on Private Mobile Networks, CBRS is both the most widely used and the fastest growing band worldwide for private 5G/LTE deployments.

Our achievements align perfectly with the Committee's goals of unleashing American innovation, accelerating secure 5G deployment, and ensuring effective stewardship of federal spectrum resources. They also provide a proven blueprint for future shared spectrum frameworks the Congress may wish to consider.

Placing CBRS "back on the auction block" would reverse these gains. It would chill investment, strand billions of dollars in existing infrastructure, leave our nation with no option for private cellular networks, and undercut the very ORAN ecosystem that the United States—and many members of this Committee—have championed as the antidote to CCP-backed vendors. Such a move would be diametrically opposed to the goals of protecting American innovation and promoting our technology leadership abroad. No stakeholder in the CBRS band, including the DoD, has identified harmful interference or operational deficiencies that would justify such disruption. Moreover, beyond many of our organizations who purchased licenses in this band, the band is by design open to anyone who wants to use it, including those who did not opt to bid on priority rights but who want to use it to service customers using 5G. It makes little sense to narrow the eligibility of the band to national carriers.

**Congress has two straightforward legislative avenues to safeguard this progress.** First, it can simply remove CBRS from the Commission's general auction authority—our preferred approach because it provides full certainty for investors and innovators. Alternatively, the Committee could mirror the treatment already afforded the 3.1–3.45 GHz and 6 GHz bands by excluding CBRS from the list of “covered bands” that may be counted toward satisfying any clearing targets. While this second option would not entirely insulate CBRS from future auction related uncertainty, it would markedly reduce investment risk for 5G and ORAN deployments that rely on the band and we believe would only have minimal effects on the revenue projections of the overall legislation.

For these reasons, we respectfully request that the 3.5 GHz CBRS band be expressly excluded from any legislation reauthorizing the FCC's general auction authority, or, at a minimum, be removed from the list of “covered bands” eligible for clearing targets. Doing so will preserve a model of spectrum innovation, continue to fortify U.S. technology leadership, and ensure that American companies—not Huawei and ZTE—set the pace in next generation wireless networks.

Thank you for your leadership and consideration. We stand ready to provide any additional information the Committee may require.

Very respectfully,

Celona Inc.  
Comcast Corp.  
Cox Communications  
Hewlett Packard Enterprise (HPE)  
Imagine Wireless  
Innovation Economy Alliance  
JMA Wireless  
Midcontinent Communications  
Nextlink Internet  
Public Knowledge  
WISPA –Association for Broadband Without  
Boundaries

Charter Communications, Inc  
Consumer Action for a Stronger Economy  
Digital Global Systems  
Miami International Airport  
InfiniG  
Institute for Policy Innovation  
MediaCom  
NCTA – The Internet & Television Association  
Open Technology Institute at New America  
Spectrum for the Future