

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of

Flexible Use in Mid-Band Spectrum
Between 3.7 and 24 GHz

GN Docket No. 17-183

5G AMERICAS REPLY COMMENTS

5G Americas applauds the Commission for its Notice of Inquiry examining the suitability of flexible use in the 3.7 – 24 GHz spectrum range (“Mid-Band”). The Fifth Generation of wireless technologies – or “5G” – will require adequate amounts of spectrum in the low-band, mid-band and high-band frequency ranges. As the Commission is aware, mobile data traffic is expected to grow by 7-8 times by 2022.¹ Given the length of time it takes to repurpose spectrum and relocate incumbents, the Commission is wise to begin this Notice now. 5G Americas represents operators and vendors from around our region, and participates in the biennial Global 5G Event held to date in Asia and Europe.² Next year, 5G Americas will host the Global 5G Event here in the United States. Due to its role and activities, 5G Americas is well aware of what bands of spectrum are being reviewed for 5G in leading markets overseas. That is why 5G

¹ ERICSSON, ERICSSON MOBILITY REPORT at 12 (June 2017), available at <https://www.ericsson.com/assets/local/mobility-report/documents/2017/ericsson-mobility-report-june-2017.pdf>.

² The Global 5G Event is an event where the world’s leading 5G organizations discuss the latest research and development achievements and views on 5G technologies, spectrum, standardization, field trials, applications, the future Roadmap for 5G and global collaboration. The series of events is based on a multilateral Memorandum of Understanding to cooperate on building global consensus on 5G with world’s 5G promotion organizations: The Fifth Generation Mobile Communications Promotion Forum (5GMF, Japan), 5G Forum (Korea), 5G Americas (Americas), IMT-2020 (5G) Promotion Group (China), 5G Infrastructure Association (5G-IA, Europe). The event is held twice a year in rotation. See <http://www.5gamericas.org/en/newsroom/press-releases/telebrasil-projeto-5g-brasil-joins-leading-5g-visionary-organizations-china-europe-japan-south-korea-and-americas-global-5g-even/>

Americas is pleased the FCC is looking at additional Mid-Band ranges, such as the 3.7-4.2 GHz band, which includes spectrum that is being reviewed in Asian and European markets for 5G. Because the 3.7 – 4.2 GHz band is adjacent to the 3550- 3700 MHz band, already identified by the Commission for mobile broadband, the 3.7 – 4.2 GHz band is particularly of interest to 5G Americas for licensed broadband service.

5G Americas published the attached White Paper on the *Spectrum Landscape for Mobile Services* earlier this month and files it in the above captioned proceeding as a resource for the Commission, as it reviews the suitability of various bands in the Mid-Band range of spectrum. The paper reviews the landscape for the Mid-Band ranges of 3.7-4.2 GHz, 5.9 – 6.1 GHz and 6.4 – 7.1 GHz, as well as the millimeter wave spectrum that the Commission has already allocated for flexible use. The paper reviews the spectrum landscape for these bands both in the U.S., and in other active markets overseas. 5G Americas advocates for globally harmonized bands, and believes the U.S. public interest will be served by the Commission identifying spectrum that is likely to be harmonized for that use globally. We therefore hope the White Paper will be of interest to the Commission as it further considers this Mid-Band range of spectrum for flexible use.

Respectfully submitted,



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