



STARRY™

38 Chauncy Street, 2nd Floor
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January 11, 2017

The Honorable Mignon Clyburn
Commissioner
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Comments in response to #Solutions2020 Call to Action Plan

Dear Commissioner Clyburn:

On December 19, 2016, your office released a draft of #Solutions2020, your action plan to modernize the communications landscape and provide more robust, affordable connectivity in communities across our nation. As a start-up technology company that aims to connect millions of consumers through innovative fixed-wireless, millimeter wave technology, we are excited about your commitment to supporting next-generation communications services and ensuring that the next wave of technologies does not bypass already underserved communities.

Broadband access can mean the difference between finding a job and remaining unemployed, or a child completing his or her homework or going to school empty-handed. Today, access to a reliable internet connection is a necessity, not a luxury. As you know, for many people, access to reliable, high-speed internet is unaffordable and out of reach. However, with the advent of new 5G technologies such as Starry, affordable broadband access can be a reality.

5G represents an opportunity to use high frequency spectrum in new and innovative ways, providing another choice in connectivity for millions of people and small businesses, in both urban and rural areas. In the FCC's Spectrum Frontiers Proceeding, the Commission took a measured and thoughtful approach to spectrum licensing in the millimeter wave bands. The combination of exclusively-licensed, shared and unlicensed spectrum created the all-important balance of ensuring competition and the promotion of a free market that supports the investment in and development of new innovations that will power the next generation of fixed and wireless technologies. Not limiting the licensing approach will ensure that the highest, best and most innovative uses emerge to serve rural and urban America.

We applaud your recognition of the varied and many potential uses included in the 5G evolution and encourage your office to continue supporting a spectrum framework that prevents the warehousing of spectrum and preserves the licensing balance needed to encourage competition and investment in these bands.



Additionally, we support your efforts to streamline access to Lifeline services, making it easier for eligible consumers to apply those funds towards internet access. We encourage your office and the broader Commission to look at ways to engage new technology entrants in the broadband space to participate in providing Lifeline-eligible service, as well as engaging municipalities to look at ways to increase eligible household participation in Lifeline services. Through sponsoring workshops or information sessions, encouraging a dialogue between new technology providers and municipalities can help create the public-private partnerships necessary to bridge the digital gap among underserved communities.

Starry also supports proposals to lower barriers to deployment for new services, including streamlining infrastructure siting policies for small cell deployment and ensuring that municipal and common carrier assets are made available on a nondiscriminatory basis. Ensuring that there is a fair and level playing field and a marketplace free of discriminatory practices will enable new technology entrants the ability to compete fairly with incumbent providers and expand the number of choices Americans have for internet service.

More than ever, connecting our communities with robust, reliable internet is a crucial component to economic growth and security. We appreciate and applaud your efforts to create concrete solutions that not just 'connect the dots,' but develop a broader picture on the steps we must take to make affordable access to communications a reality for all Americans. We look forward to continuing to work with your office and the Commission and thank you for your time.

Respectfully submitted on behalf of Starry, Inc.,

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Starry, Inc.