

**STATEMENT OF
COMMISSIONER AJIT PAI**

Re: *Amendment of the Commission's Rules with Regard to Commercial Operations in the 3550-3650 MHz Band, GN Docket No. 12-354*

This afternoon, we launch a proceeding to explore the prospect of spectrum sharing and small cell use in the 3.5 GHz band. In order to free up more spectrum for mobile broadband, we must be willing to think creatively and to study out-of-the-box ideas. And we should approach spectrum policy from a practical perspective, not a theoretical or an ideological one. Our lodestar should be simple: what works?

It is in this spirit that I will examine the record that will be compiled in this proceeding. Can our proposals be implemented in the real world? If so, can they be executed in a timely manner? I am eager to hear from carriers, equipment manufacturers, federal government agencies, and other stakeholders on these important questions. If at that point we decide to ratify the proof of concept, we still will need the benefit of their wisdom on whatever specific technical rules we propose.

One issue I will be interested in examining is whether we can keep exclusion zones small. Approximately 60 percent of the U.S. population would not be able to use the 3.5 GHz band under the exclusion zones proposed in the National Telecommunications and Information Administration's Fast Track Report. This is especially troubling because the substantial majority of spectrum-limited markets fall within these zones. For example, if we cannot shrink these zones substantially, the 3.5 GHz band would not benefit Americans who live in New York City, Boston, Philadelphia, Washington, D.C., Miami, Tampa, Orlando, Atlanta, New Orleans, Houston, Dallas, San Diego, Los Angeles, San Francisco, Portland, Seattle, and Denver. (Fortunately, most Kansans from Overland Park to Goodland would do just fine.)

I hope that small cells will enable us to have much smaller exclusion zones and that commenters will provide us with valuable feedback on this issue. I also hope that the Commission will soon take action to exempt small cells from our environmental processing requirements. Small cells hold much promise for improving network coverage and capacity at lower power, and we shouldn't impede their deployment in the 3.5 GHz band (or any other bands) with unnecessary red tape.

My vote today should not be interpreted as an endorsement of all the recommendations contained in the recent report by the President's Council of Advisors on Science and Technology. I do not support abandoning the tried-and-true method of spectrum clearing and instead relying exclusively on spectrum sharing to make available additional spectrum for commercial use. In particular, I believe that we still must focus on clearing federal spectrum on lower frequencies for commercial use, starting with the 1755–1780 MHz band. By thinking creatively about all options, such as establishing financial incentives for federal users to relocate, we can make this and other bands usable for mobile broadband.

Finally, I would like to thank the staffs of the Wireless Telecommunications Bureau, International Bureau, and Office of Engineering Technology for their hard work on this item. I also look forward to receiving their counsel on the many difficult issues we will confront as we assess whether and how to implement the framework set forth in this NPRM.