

August 28, 2023

The Honorable Jessica Rosenworcel  
Chairwoman  
Federal Communications Commission  
45 L Street NE  
Washington, DC 20554

The Honorable Alan Davidson  
Assistant Secretary of Commerce for  
Communications and Information  
U.S. Department of Commerce  
1401 Constitution Avenue NW  
Washington, DC 20230

The Honorable Nathaniel C. Fick  
Ambassador at Large  
Bureau of Cyberspace and Digital Policy  
U.S. Department of State  
2201 C St NW  
Washington, DC 20520

Dear Chairwoman Rosenworcel, Assistant Secretary Davidson, and Ambassador Fick:

Through investment and advances in next-generation satellite technologies the American satellite industry is experiencing unprecedented growth. Satellites in low earth orbit (LEO) are delivering high-speed broadband and offering connectivity solutions that address the long-standing digital divide in the U.S. and globally. Now more than ever, it is imperative for the federal government to promote this promising technology and continue to support the acceleration of a competitive satellite broadband industry that enables the U.S. to maintain its leadership in space and satellite technology.

Broadband connectivity, both at home and across the globe, is essential for including all communities in the modern digital economy. Millions of Americans continue to lack access to broadband at home. Globally, approximately 3 billion people do not have home internet access. The benefits of universal connectivity would not just be felt by those who lack access now – expanding connectivity creates a “rising tide” phenomenon in communities, encouraging improvement across industries. We believe that LEO satellite broadband offers great potential to help bridge the global digital divide.

Satellite broadband offers particular promise in connecting the unconnected because it now offers high-capacity throughput and a quality user experience without the geographical barriers to deployment that can create high costs and long delays for wireline service. For geographically or topographically difficult-to-reach communities, LEO broadband offers a solution that requires only a customer terminal and access to sky. Additionally, U.S. research and development are leading the way in the advancement of the LEO industry. The U.S. has long been ahead of the curve on space development and exploration, and we are home to a robust private sector space industry.

With such rapid innovation and investment across the satellite space, it is important that the U.S. government continue to strengthen American leadership in this sector. The Federal Communications Commission and National Telecommunications and Information Administration should implement

policies that foster competition and innovation that benefit both consumers and the U.S. economy more broadly. Although this technology and market has been pioneered by American companies, LEO constellations are inherently global, making U.S. leadership at bodies like the International Telecommunication Union (ITU) and the Inter-American Telecommunication Commission (CITEL) vital to a thriving industry and U.S. interests.

Accordingly, we urge you to prioritize LEO NGSO systems and policies by expanding spectrum access and leveling the playing field between LEOs and incumbent technologies. For example, LEO systems rely entirely on shared spectrum, which makes it critical to modernize outdated ITU coexistence criteria to ensure more efficient and equitable access to shared spectrum resources for both LEO and GSO networks. Such a policy environment will give consumers more options, promote innovation, lower costs and, most importantly, enable many more people to connect to the internet both at home and globally.<sup>1</sup>

LEO satellite broadband is revolutionizing connectivity and offering a solution for fast, reliable internet to every community. We believe your prioritization of LEO broadband, both at home and abroad, will help unleash a new wave of global connectivity. We look forward to partnering with you to support bridging the digital divide.

Respectfully submitted,

Access Humboldt  
American Library Association  
Benton Institute for Broadband & Society  
Digital First Project  
Digital Progress Institute  
Center for Rural Strategies  
CoSN – Consortium for School Networking  
Information Technology Industry Foundation  
International Center for Law & Economics  
Lexington Institute  
Next Century Cities  
Open Technology Institute at New America  
Public Knowledge  
R Street Institute  
State Educational Technology Directors Association

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<sup>1</sup> See Harold Furchtgott-Roth, “The Economic Benefits of Updating Regulations that Unnecessarily Limit Non-Geostationary Satellite Orbit Systems” (August 2023), available at [https://papers.ssrn.com/sol3/papers.cfm?abstract\\_id=4538619](https://papers.ssrn.com/sol3/papers.cfm?abstract_id=4538619).