U.S. Chamber of Commerce

1615 H Street, NW
Washington, DC 20062-2000
uschamber.com

August 20, 2024

Alan Davidson
Administrator
National Telecommunications and
Information Administration
U.S. Department of Commerce
1401 Constitution Ave NW
Washington, DC 20230

Re: Request for Comments, National Telecommunications and Information Administration; Advancement of 6G Telecommunications Technology (89 Fed. Reg. 45,648-45,650, May 23, 2024)

Dear Administrator Davidson:

The U.S. Chamber of Commerce ("Chamber") appreciates the opportunity to comment on the National Telecommunications and Information Administration's ("NTIA") Request for Comments ("RFC") on the Advancement of 6G Telecommunications Technology, focused on 6G use cases and policy considerations for the U.S. government.[1]

I. The Promise of 6G

Private sector development and deployment of 6G will have a substantial economic impact. The Commerce Spectrum Management Advisory Committee's Report of Subcommittee on 6G provides a roadmap on the numerous government and non-government use cases of 6G, including robotics, immersive technologies, sensing and communications, and immersive experiences.[2] NTIA should continue to engage with industry stakeholders to understand various 6G use cases and consider how use cases impact the U.S. government's 6G policy approach and priorities.

Further, while the use cases for 6G continue to emerge, we encourage NTIA to collaborate with the private to build on and not lose sight of other connectivity technologies, including existing wireless technologies.

II. The Government's Role in Enabling 6G

While the private sector drives the development and eventual deployment of 6G networks, the U.S. government has a critical role for providing the enabling environment for 6G

[1] Advancement of 6G Telecommunications Technology, Request for Comments, National Telecommunications and Information Administration, 89 Fed. Reg. 45,648 (May 23, 2024).
[2] NATIONAL TELECOMMUNICATIONS AND INFORMATION ADMINISTRATION, U.S. DEPARTMENT OF COMMERCE, COMMERCE SPECTRUM MANAGEMENT ADVISORY COMMITTEE (CSMAC) REPORT ON 6G (2023).

to succeed. Active partnership and engagement with the private sector should be core to all the government's 6G-related activities. Already, the U.S. government has facilitated helpful public-private forums such as the Commerce Spectrum Management Advisory Committee and the Federal Communication Commission's Technology Advisory Council.[3]

Research and Development: Public and private research and development ("R&D") investments lay the foundation for wireless innovation and technologies of the future, such as 6G. Hundreds of private sector organizations are already investing billions of dollars in 6G R&D in recognition of the private industry's key role in enabling a 6G future.[4] The federal government can help support private sector efforts through targeted federal support for basic and applied R&D and public-private partnerships. The CHIPS and Science Act's Technology, Innovation and Partnerships ("TIP") directorate at the National Science Foundation presents a helpful model to facilitate public investment in 6G. However, Congress has not provided sufficient appropriations to TIP and R&D programs across the board to enable robust federal support for critical and emerging technologies. This ultimately risks U.S. leadership in 6G. Finally, the government should refrain from imposing the Department of Commerce's proposed march-in guidance, which threatens to confiscate intellectual property and endangers 6G R&D public-private partnerships.[5]

***International Collaboration*:** While the United States must lead in 6G, international collaboration with key allies will be critically important to fostering the responsible development and deployment of 6G. The Chamber urges policymakers to facilitate multilateral and bilateral 6G cooperation between governments and industry stakeholders based on previous activities, including the *Joint Statement Endorsing Principles for 6G*, the B7 Summit 2023's focus on 6G as critical emerging technology for digital transformation, and the U.S. and India's strategic partnership on Critical and Emerging Technology (iCET).[6]

***Standards*:** We appreciate the RFC's recognition of standards development for 6G. The Chamber believes that the development of standards for critical and emerging technology, such as 6G, is best led by the private sector to promote common, technically sound approaches that deliver on technology solutions and U.S. policy objectives. The development of 6G standards should be voluntary, open, transparent, globally recognized, consensus-based, and technology neutral.

---

[3] Id.

[4] Simon Sherrington, 6G R&D is underway, but operators need to understand the business case for investment, ANALYSIS MASON (May 1, 2024), https://www.analysysmason.com/research/content/articles/6g-research-investment-rma08/.

[5] Brad Watts and Matt Furlow, Biden's March-In Rights Proposal Risks CHIPS Investments, U.S. CHAMBER OF COMMERCE (July 29, 2024), https://www.uschamber.com/intellectual-property/bidens-march-in-rights-proposal-risks-chips-investments.

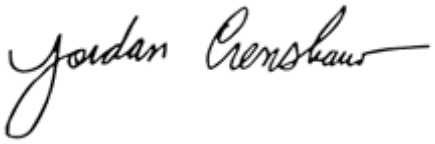
[6] See EXECUTIVE OFFICE OF THE PRESIDENT, JOINT STATEMENT ENDORSING PRINCIPLES FOR 6G: SECURE, OPEN, AND RESILIENT BY DESIGN (2024); B7 Tokyo Summit Joint Recommendation (April 20, 2023), https://www.keidanren.or.jp/en/policy/2023/028.html; EXECUTIVE OFFICE OF THE PRESIDENT, JOINT FACT SHEET: THE UNITED STATES AND INDIA CONTINUE TO CHART AN AMBITIOUS COURSE FOR THE INITIATIVE ON CRITICAL AND EMERGING TECHNOLOGY (2024).

***Spectrum*:** While the RFC is not focused on spectrum requirements and issues pertaining to 6G, spectrum issues are nonetheless directly relevant to the development and deployment of 6G. As NTIA and the U.S. government continues its work on 6G, we encourage engagement with federal agencies and industry on spectrum needs, planning, technology development, including in future iterations of the National Spectrum Strategy.

III. Conclusion

Thank you for considering our views on this RFC. If you have any questions, please contact Matt Furlow, Senior Director and Policy Counsel at the Chamber Technology Engagement Center, at mfurlow@uschamber.com.

Sincerely,



Jordan Crenshaw
Senior Vice President
Chamber Technology Engagement Center
U.S. Chamber of Commerce