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March 14, 2018

Chairman Ajit Pai
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Preserving Vacant Channels for Unlicensed TV White Space

Dear Chairman Pai:

With this letter members of the Midwest Food Products Association (MWFPA) respectfully request adoption of the regulations needed to make TV White Space technology a reality in the market for broadband access, thus helping to ensure the availability of broadband services in rural America.

The MWFPA represents a diverse group of food processors in Illinois, Minnesota and Wisconsin and a large number of industry related businesses. Wisconsin and Illinois rank nationally among the top three states in food manufacturing shipping over \$43 billion and \$45 billion in product respectively.

Today, rural areas are more economically diverse than in the past with employment reliant not only on agriculture and mining, but also manufacturing. Along with Minnesota, food manufacturers in our three states employ over 185,000 people - many of them in rural markets. However, global economic forces and technological advances that resulted in changes to manufacturing have disproportionately affected rural areas in these states and will likely continue to cause disruption. Employment losses in manufacturing, for example, may be a key component of the slow rural jobs recovery experienced since the last recession.

Infrastructure investments, like expanding broadband internet access, could improve economic performance in addition to contributing to quality of life and job opportunities through more robust delivery of education, healthcare, public safety, and other services.

According to the FCC's *2016 Broadband Progress Report*, approximately 24 million Americans live in rural communities that lack the network infrastructure necessary to provide a reliable and affordable broadband connection. It's estimated that broadband Internet served on the White Space spectrum could reach 80 percent of the rural population that lacks high-speed Internet access today. TV White Space technology can deliver high speed Internet that operates four times faster and reaches 16 times farther than Wi-Fi. And this technology operates at a frequency that can move through objects like hills and foliage.

In order to take advantage of TV White Spaces, the FCC needs to ensure the continued use of at least three channels below 700 MHz on an unlicensed basis in every market in the country.

On behalf of our membership I respectfully urge you to finalize the permanent policies necessary to ensure that White Space can be used at a commercial scale. Please take the actions necessary to make this technology available to those who need it most. Thank you for your attention to this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "Nickolas C. George Jr.", written in a cursive style.

Nickolas C. George Jr.
President, MWFPA

cc: Speaker Paul Ryan