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General Comment

Comments of CTIA attached.

Attachments

CTIA Comments on AI RandD Plan RFI (5-29-2025)



May 29, 2025

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Re: Request for Information on the Development of a 2025 National Artificial Intelligence (AI) Research and Development (R&D) Strategic Plan, Docket ID No. NSF-2025-OGC-0001

Dear Director Kratsios and Ms. Plimpton,

CTIA¹ welcomes the opportunity to respond to the Request for Information issued by the National Science Foundation (“NSF”), on behalf of the White House Office of Science and Technology Policy (“OSTP”), regarding development of a 2025 National AI R&D Strategic Plan (“R&D Plan”).²

CTIA and its wireless industry members commend the Trump Administration’s focus on securing the United States’ position as the world leader in AI. CTIA supported the

¹ CTIA – The Wireless Association® (“CTIA”) (www.ctia.org) represents the U.S. wireless communications industry and the companies throughout the mobile ecosystem that enable Americans to lead a 21st century connected life. The association’s members include wireless carriers, device manufacturers, and suppliers as well as apps and content companies. CTIA vigorously advocates at all levels of government for policies that foster continued wireless innovation and investment. CTIA represents a broad diversity of stakeholders, and the specific positions outlined in these comments may not reflect the views of all individual members. The association also coordinates the industry’s voluntary best practices, hosts educational events that promote the wireless industry and co-produces the industry’s leading wireless tradeshow. CTIA was founded in 1984 and is based in Washington, D.C.

² This document is approved for public dissemination. The document contains no business-proprietary or confidential information. Document contents may be reused by the government in developing the 2025 National AI R&D Strategic Plan and associated documents without attribution. *Request for Information on the Development of a 2025 National Artificial Intelligence (AI) Research and Development (R&D) Strategic Plan*, 90 Fed. Reg. 17835 (Apr. 29, 2025) (“RFI”).



Administration's effort launched earlier this year to develop an AI Action Plan that will promote American AI leadership and prosperity, while ensuring that heavy-handed regulatory measures do not needlessly hamper private sector AI innovation.³ Now, in revising the plan for AI R&D, the Trump Administration will take the reins to revise the previous administration's approach, accelerate AI-driven innovation, and enhance U.S. economic and national security.

In its new plan, the Administration should recognize that the success of AI depends on next-generation 5G wireless networks – and sufficient spectrum to power those networks. U.S. Senate Commerce Committee Chairman Ted Cruz may have summed it up best: “If we do not lead on spectrum, we will lose the 21st century technology race to China, one that includes critical adjacent industries like [AI] That cannot happen.”⁴

American innovation to date has flourished largely as a result of wireless ingenuity, expansive network deployments providing anywhere connectivity and, in turn, the availability of spectrum to meet the ever-growing data needs that innovations demand. The critical challenge for AI that we face as a nation – for both private sector- and government-led AI progress – is precisely the same: ensuring sufficient access to wireless spectrum for 5G to support the growing demands from AI applications. Without adequate commercial spectrum available to power thousands of bandwidth-hungry AI applications and hundreds of millions of users and devices, the United States risks losing its edge in the global race for AI leadership.

The promise of American leadership in 5G and AI has broad spillover effects for U.S. leadership across the globe. As Director Kratsios recently observed:

Our industrial might, unleashed at home, and our technical achievements from AI to aerospace, successfully commercialized, can also be powerful instruments of diplomacy abroad and key components of our international alliances. American progress in critical technologies will make us the global partner of choice and the standards setter to follow if we enable and encourage American companies to distribute the American tech stack around the world.⁵

The first step toward AI leadership is identifying additional spectrum resources for 5G technologies and beyond. AI applications will fundamentally rely on communications networks, and wireless connectivity in particular. AI demands ever faster speeds, lower latency, higher throughput, and importantly, it requires anywhere connectivity and massive

³ See Comments of CTIA (Mar. 15, 2025), <https://files.nitrd.gov/90-fr-9088/CTIA-AI-RFI-2025.pdf> (“CTIA AI Action Plan Comments”).

⁴ CTIA Everything Wireless, *2025 CTIA 5G Summit | Keynote: Senator Ted Cruz*, YouTube (May 9, 2025), <https://www.youtube.com/watch?v=St2lWikuwUE> (“Cruz 5G Summit Keynote”).

⁵ Director Kratsios, Remarks at the Endless Frontiers Retreat (Apr. 14, 2025), <https://www.whitehouse.gov/articles/2025/04/remarks-by-director-kratsios-at-the-endless-frontiers-retreat/>.



network capacity to integrate data inputs and move colossal quantities of data at the scale and speed needed for complex, AI-driven functions. Next-generation wireless technologies not only provide the fuel needed for the AI-powered future, but also drive American innovation, job creation, economic growth, and national security. As FCC Chairman Carr recognized at CTIA's recent 5G Summit:

Data demands have been increasing . . . for years. . . . It is important to the Trump Administration that the U.S. lead the way on AI [, not China]. We want AI to develop in the U.S., . . . but to do that, we must make sure that it works on our mobile networks. . . . We have to have the spectrum [and] the necessary infrastructure so that AI can be mobile.⁶

To maintain U.S. leadership in AI, we need more licensed, full-power mid-band spectrum to support these capabilities and provide the capacity sufficient to power this AI-driven digital world.

The United States has the chance now to put in place R&D initiatives that will ensure U.S. global leadership in AI by identifying additional spectrum resources for 5G technologies. To do so, the Administration should work with Congress to renew the Commission's spectrum auction authority, and support research underway both domestically and internationally that can identify key spectrum bands that can be repurposed here in the U.S. and abroad for full power, commercial wireless mid-band spectrum.

To develop this pipeline, in its R&D Plan, OSTP should support studies that are exploring key spectrum opportunities for 5G. CTIA also encourages the Administration to apply four guiding principles to ensure spectrum is front-and-center in America's AI strategy: (1) orient spectrum research toward improving private sector investment and commercially viable deployment; (2) focus on expanding commercial access for full-power spectrum, which is a proven driver of American innovation, investment, and national security; (3) promote equitable transparency and access to technical information in government-industry stakeholder engagements; and (4) support industry-driven operating systems research⁷ and development of international operational and technical standards. With a new R&D Plan that focuses on the studies that will inform efforts to refuel the spectrum pipeline for commercial 5G technologies, this Administration can promote the success of 5G and AI and ensure American AI leadership for decades to come.

⁶ CTIA Everything Wireless, *2025 CTIA 5G Summit | Fireside Chat: FCC Chairman Brendan Carr and CTIA's Ajit Pai*, YouTube (May 9, 2025), https://www.youtube.com/watch?v=8O_9NIQZF08.

⁷ To accelerate U.S. AI innovation and competitiveness, research on optimal distribution of AI workloads between cloud and on-device platforms can maximize efficiency, privacy, and scalability.



To Secure Its Global AI Leadership, the United States Should Develop an AI R&D Plan That Recognizes the Critical Role 5G Plays in Powering AI.

The nation's leading policymakers and wireless industry leaders are drawing attention to the critical connection between 5G and AI leadership. For instance, at CTIA's 5G Summit this month, speaker after speaker highlighted that 5G is a crucial enabler for AI, and together 5G and AI portend transformative benefits across nearly every sector of the U.S. economy and for every critical function that enables Americans to live, work, and thrive.⁸

As former FCC Chairman under President Trump, and CTIA President and CEO Ajit Pai, explained: "[t]his [summit] is not limited to 5G; we are talking about the future of U.S. global competitiveness, of leadership in manufacturing, AI, defense, healthcare, and more. The countries that lead the world in wireless will lead in every technology-enabled sector."⁹

Wireless providers are continuing to deploy more connectivity, and optimize their radio access networks, systems, devices, and solutions using AI-powered innovations. As CTIA's AI Action Plan Comments explained, wireless providers are already using AI to: (i) analyze vast quantities of network data, identify patterns, and predict outcomes to avoid network outages and optimize network operations; (ii) prevent fraud, robocalls, and robotexts; (iii) provide virtual assistance with AI-based natural language processing, customer engagement tools, intelligent routing, interactive voice response, webforms, and bots; (iv) optimize product delivery; (v) optimize network deployments and operations; and (vi) strengthen cybersecurity.¹⁰ As industry leaders noted at the 5G Summit:

Yigal Elbaz, Senior Vice President of Technology & Network Services and Network Chief Technology Officer (CTO), AT&T: "AI will be embedded into wireless networks. We are transitioning from a cloud-native 5G to an AI-native future-G. AI can be used for our network planning, and for automatic diagnosis and repairing of the network in real time when there are issues. An open and programmable, modernized network with an API platform enables innovation

⁸ 2025 CTIA 5G Summit, CTIA (May 6, 2025), <https://www.ctia.org/news/2025-ctia-5g-summit>.

⁹ CTIA Everything Wireless, *2025 CTIA 5G Summit | Opening Remarks: CTIA's Ajit Pai*, YOUTUBE (May 9, 2025), <https://www.youtube.com/watch?v=iVnFw0sM0c>. For example, in the health sector, AI-enabled remote surgery, patient monitoring, and personalized treatments will require the low latency, high capacity, and throughput of 5G networks. In transportation, autonomous vehicles rely heavily on real-time data processing, and by combining 5G's speed and AI's decision-making capabilities, these vehicles can now make split-second decisions, ensuring safety and efficiency on the roads. See Sally Eaves, *Revolutionizing the future of AI and 5G technology*, AT&T BUSINESS INSIGHTS BLOG (Feb. 1, 2024), <https://www.business.att.com/learn/articles/revolutionizing-the-future-of-ai-and-5g-technology.html>.

¹⁰ See CTIA AI Action Plan Comments at 3-6.



and efficiency. Demand will only increase, and to support all of that demand and innovation, we will need additional mid-band spectrum.”¹¹

Ulf Ewaldsson, President of Technology, T-Mobile: “The U.S. is successfully fostering a parallel development strategy with growing innovations in cloud and AI technology. The constant innovation is fueling the digitalization of U.S. companies and enterprises and is being reflected in the market. . . . Looking ahead towards 5G Advanced, we will embrace AI. Our classic mobile network has become a precision platform that can deliver precise customer experiences on demand.”¹²

Kyle Malady, Executive Vice President and CEO Verizon Business Group, Verizon: “Spectrum is the clay that we need to grow this industry. AI capability will be integrated into the network. We are working on new ways to put the computing right on the edge. AI will be mobilized and will be personalized to the user. Almost every vertical sector is ripe for innovation. AI is only as good as the data that it is trained on, and the only way to improve it is to add more data, so IoT will play a large role as well.”¹³

Peter Linder, Head of Thought Leadership, Ericsson North America: “Several technologies drive these innovations together: AI, cloud computing, and mobile. The mobile piece offers innovations such as dynamic network slicing. The mobile piece also takes the longest time to build from an infrastructure level, so it is important to roll it out before we need it and have the spectrum in place early.”¹⁴

In short, leading policymakers and industry experts agree that U.S. spectrum policy is integral to any strategic discussion of how to accelerate innovation in AI and secure American leadership in both wireless and AI.

¹¹ CTIA Everything Wireless, 2025 CTIA 5G Summit | Fireside Chat: AT&T's Jenifer Robertson and Yigal Elbaz, YouTube (May 9, 2025), <https://www.youtube.com/watch?v=TCEg33fZyby>.

¹² CTIA Everything Wireless, 2025 CTIA 5G Summit | Keynote: T-Mobile's Ulf Ewaldsson, YouTube (May 9, 2025), <https://www.youtube.com/watch?v=9Q55C0DMbNA>.

¹³ CTIA Everything Wireless, 2025 CTIA 5G Summit | Fireside Chat: Verizon Business' Kyle Malady and CTIA's Ajit Pai, YouTube (May 9, 2025), https://www.youtube.com/watch?v=I5yE_BOiSfo.

¹⁴ CTIA Everything Wireless, 2025 CTIA 5G Summit | Keynote: Ericsson's Peter Linder, YouTube (May 9, 2025), <https://www.youtube.com/watch?v=wQXM6l1x6ZA>.



The United States Should Prioritize Additional Spectrum to Advance AI Leadership, and Economic and National Security.

The U.S. wireless industry is a quintessential American success story, with 5G supporting U.S. economic competitiveness and our national security today. It adds \$825 billion to the GDP annually and nearly 4.5 million jobs, and it has a track record of driving our economy forward, investing more than \$700 billion over the lifetime of the industry.¹⁵ As a result of these investments in technological innovation and deployment, there were more than 1.6 wireless connections for every American by the end of 2023 and 5G is available to more than 330 million people nationwide.¹⁶ Wireless investment, innovation, and competitiveness in today's economy also represent a national security imperative as U.S. wireless leadership and our strategic national interests face technological and geo-political threats. As FCC Chairman Carr recently observed, “[w]hen we free up spectrum, the world takes notice. It puts the wind at the backs of those working to advance our values. It ensures that next-generation wireless services develop in ways that will benefit our innovators and interests – rather than regimes that seek to diminish America’s standing in the world.”¹⁷

As wireless connectivity enhances manufacturing, employment, healthcare, security, and communications outcomes for businesses and consumers, it is also driving skyrocketing data demands. Wireless data traffic nearly doubled from 2021 to 2023, representing the largest single-year increase in wireless data ever.¹⁸ Across North America, total mobile data traffic per month is expected to increase 250 percent in the next five years.¹⁹ In the near term, increasing congestion due to a lack of spectrum risks degraded network performance: if more licensed spectrum is not made available, wireless networks are expected to be unable to meet nearly a quarter of peak traffic demand as soon as 2027 and a third of data traffic is projected to go unmet by 2029.²⁰

¹⁵ See *How Licensed Spectrum Fuels U.S. Competitiveness*, CTIA, at 6 (Apr. 2024), <https://api.ctia.org/wp-content/uploads/2024/04/American-Competitiveness.pdf>; *2024 Annual Survey Highlights*, CTIA, at 2 (Sept. 2024), <https://api.ctia.org/wp-content/uploads/2024/09/2024-Annual-Survey.pdf> (“CTIA 2024 Annual Survey Highlights”).

¹⁶ See CTIA 2024 Annual Survey Highlights at 2, 4.

¹⁷ Testimony of Brendan Carr, Chairman, FCC, Before the Subcommittee on Financial Services and General Government of the U.S. House of Representatives Committee on Appropriations, at 2 (May 21, 2025).

¹⁸ CTIA 2024 Annual Survey Highlights.

¹⁹ *Ericsson Mobility Report*, ERICSSON (Nov. 2024), <https://www.ericsson.com/4adb7e/assets/local/reports-papers/mobility-report/documents/2024/ericsson-mobility-report-november-2024.pdf>.

²⁰ See *Securing the Future of U.S. Wireless Networks: The Looming Spectrum Crisis*, ACCENTURE (Mar. 2025), <https://api.ctia.org/wp-content/uploads/2025/03/Looming-Spectrum-Crisis-Accenture.pdf> (“Accenture March



Powerful AI tools will increase demand on wireless networks, requiring rich bidirectional data transfer. These AI capabilities – including mobile applications such as real-time visual and audio interfaces, autonomous vehicles, and extended reality devices – will drive up consumer data usage. Devices are where consumers are going to be engaging directly with AI at scale, and AI has the potential to optimize how operating systems, hardware, and user interfaces manage information and enhance the consumer experience. With expected growth in usage, AI applications are projected to drive uplink traffic 20% higher than it would be with existing applications.²¹ Mobile operators will need much more uplink capacity in high-traffic areas, and uplink traffic is expected to outpace capacity as soon as 2028. By 2029, only two-thirds of uplink demand will be met if spectrum availability remains constant.²²

The United States will need to make available additional licensed, full-power spectrum to support this growth and continue this national success, particularly in the mid-band spectrum range that is foundational to 5G across the globe.²³ Without a concerted national effort to make more licensed airwaves available, the U.S. faces a more than 1,400-megahertz spectrum deficit by 2032.²⁴ Failing to address this shortfall risks harming U.S. AI leadership, wireless competitiveness, innovation, and consumer outcomes.

The solution is identifying additional spectrum – mid-band spectrum, in particular – for 5G and AI technologies. As Senator Cruz underscored, “[e]stablishing a clear and predictable amount of commercially available spectrum would allow American network operators to build the capacity they need to support the technologies of tomorrow.”²⁵ The Government should support policies that will restore the FCC’s auction authority and ensure a pipeline of full-power, licensed mid-band spectrum for 5G and beyond.

Repurposing additional mid-band spectrum for full-power, commercial wireless services will prompt further innovation and help meet growing consumer and enterprise demand. Importantly, it will also generate millions of new jobs and billions of dollars in

2025 Report”); see also Doug Brake, *Growing AI Data Traffic Requires More Licensed Mid-Band Spectrum*, CTIA Blog (Apr. 23, 2025), <https://www.ctia.org/news/growing-ai-data-traffic-requires-more-licensed-mid-band-spectrum>.

²¹ Doug Brake, *Growing AI Data Traffic Requires More Licensed Mid-Band Spectrum*, CTIA Blog (Apr. 23, 2025), <https://www.ctia.org/news/growing-ai-data-traffic-requires-more-licensed-mid-band-spectrum>.

²² Accenture March 2025 Report at 40.

²³ See, e.g., *Mid-Band-Spectrum December-2024*, GSA (Dec. 23, 2024), <https://gsacom.com/paper/mid-band-spectrum-december-2024/>.

²⁴ See Coleman Bazelon & Paroma Sanyal, *How Much Licensed Spectrum is Needed to Meet Future Demands for Network Capacity?*, THE BRATTLE GROUP, at 3-4, 24 (Apr. 17, 2023), <https://api.ctia.org/wp-content/uploads/2023/04/Network-Capacity-Constraints-and-the-Need-for-Spectrum-Brattle.pdf>.

²⁵ Cruz 5G Summit Keynote.



revenue to the United States, as every additional 100 megahertz of licensed mid-band spectrum made available brings in \$260 billion for our GDP and creates 1.5 million new jobs.²⁶ It will also enable American companies to continue developing and deploying advanced AI technologies, fueled by the wireless network capabilities and infrastructure needed to do so. Ignoring the opportunity to address the looming spectrum shortfall, on the other hand, puts at risk more than \$1.4 trillion in potential GDP over the next 10 years.²⁷ Moreover, the combination of AI and 5G – fueled by spectrum – are poised to drive massive dividends in job creation and workforce productivity.²⁸

Allied and rival nations alike are outpacing the U.S. in terms of the key input for promoting AI leadership: making licensed spectrum available for mobile use.²⁹ As Mr. Pai recently noted, China “has accelerated its efforts to dominate in wireless and will soon boast more than four times the amount of commercial midband spectrum the U.S. has. In three years, it has jumped from 17th to first in global 5G availability.”³⁰ With ample spectrum resources to support AI-friendly next-generation wireless connectivity, there is a growing risk that key AI research, development, and deployment efforts may flow overseas to China and other rival nations. It is imperative that the United States take action to sustain our leadership and prevent any such result, and that starts with spectrum.

²⁶ Dr. Hector Lopez & Julien Martin, *The Economic Impact of Each Additional 100 MHz of Mid-band Spectrum for Mobile*, NERA, at i-ii (Jan. 23, 2025), <https://api.ctia.org/wp-content/uploads/2025/01/The-economic-impact-of-allocating-mid-band-spectrum-to-mobile.pdf>.

²⁷ See Accenture March 2025 Report at 3.

²⁸ For example, as the National Spectrum Consortium described, 5G enabled AI applications are creating new jobs in “digital plus physical industries” such as agriculture, energy, construction, manufacturing, transportation, education, healthcare, government (including defense), and more. See Michael Mandel and Elliott Long, *The Third Wave: How 5G Will Drive Job Growth Over the Next Fifteen Years*, NATIONAL SPECTRUM CONSORTIUM (Sept. 2020), https://www.nationalspectrumconsortium.org/assets/docs/PPI_The-Third-Wave-5G_Portrait_Final.pdf.

²⁹ See, e.g., *Spectrum Allocation in the United States*, ACCENTURE, at 3 (Sept. 2022), <https://api.ctia.org/wp-content/uploads/2022/09/Spectrum-Allocation-in-the-United-States-2022.09.pdf>; Janette Stewart, Chris Nickerson, & Juliette Welham, *Comparison of total mobile spectrum in different markets*, ANALYSIS MASON, at 10-11 (Sept. 20, 2022), <https://api.ctia.org/wp-content/uploads/2022/09/Comparison-of-total-mobile-spectrum-28-09-22.pdf>.

³⁰ Ajit Pai, *America Has Lost Its Lead in 5G*, WSJ (May 4, 2025), <https://www.wsj.com/opinion/america-has-lost-its-lead-in-5g-fcc-tech-telecom-spectrum-auctions-c64d395f> (“Pai WSJ Op-Ed”). See also Clete Johnson, *The National Security Benefits of Reallocating Federal Spectrum for 5G*, CSIS (July 14, 2023), <https://www.csis.org/analysis/national-security-benefits-reallocating-federal-spectrum-5g>.



The United States Should Support Studies That Can Lead to Repurposing Spectrum for 5G and Beyond.

Thankfully, the Administration has the tools and the playbook necessary to drive spectrum policy to fuel strategic technologies like AI. Restoring the FCC's spectrum auction authority and identifying a pipeline of specific spectrum bands to promote U.S.-led AI innovation are the first steps. As Mr. Pai recently recalled:

Six years ago, I stood with President Trump in the Roosevelt Room of the White House to announce America's 5G strategy.³¹ It was the first time next-generation wireless technology had been elevated to a presidential policy priority. . . . The results were immediate. The U.S. freed up more commercial spectrum than ever before. We modernized outdated infrastructure rules and created an environment in which U.S. wireless providers could build world-class networks. By the end of Mr. Trump's first term, the U.S. led the world in 5G availability.³²

Unfortunately, during the last four years, the United States has been on the outside looking in when it comes to spectrum opportunities in the mid-band range. This was evident at the 2023 World Radio Conference during the last Administration, when our global competitors, including China, supported nearly 1,500 megahertz of additional mid-band spectrum for 5G while the U.S. championed only an additional 100 megahertz for new commercial access. If we do not seize the opportunity to make more spectrum available now, we risk ceding AI leadership to China and other countries that have prioritized making available the key inputs for AI.

CTIA commends the FCC for taking positive steps in the initial months of the Trump Administration to identify additional spectrum for 5G, including exploring opportunities for the Upper C-band and moving AWS-3 band inventory spectrum to auction. The Administration and Congress are now working to identify at least 600 megahertz of spectrum for commercial use, and CTIA is providing research and data to support the study of key pipeline bands. CTIA supports making spectrum available in the lower 3 GHz, Upper C-band, 4 GHz, and 7/8 GHz bands for full-power, exclusive, commercial wireless use. CTIA is exploring additional opportunities as well.

To develop this pipeline, in its R&D Plan, OSTP should support studies that are exploring key opportunities for 5G. CTIA urges the Administration to apply four guiding principles to ensure spectrum is front-and-center in America's AI strategy: (1) orient

³¹ President Trump, Remarks on United States 5G Deployment (Apr. 12, 2019), <https://trumpwhitehouse.archives.gov/briefings-statements/remarks-president-trump-united-states-5g-deployment/>.

³² Pai WSJ Op-Ed.



spectrum research toward improving private sector investment and commercially viable deployment; (2) focus on expanding commercial access for full-power spectrum, which is a proven driver of American innovation, investment, and national security; (3) promote equitable transparency and access to technical information in government-industry stakeholder engagements; and (4) support industry-driven operating systems research and development of international operational and technical standards.

In this effort, CTIA continues to urge the Administration to work across relevant federal agencies, as appropriate, to identify and make available additional licensed, full-power spectrum in the bands identified above in the near term to support 5G and beyond. The Administration should also support the studies of the 7/8 GHz and 4.4-4.8 GHz bands that are central to the upcoming World Radio Conference as opportunities for 5G international mobile telecommunications. It is critical to start these efforts to renew auction authority and refuel the spectrum pipeline now, as the time it takes between identification of suitable spectrum and deployment can impede our country's ability to assert our AI leadership on a domestic and global basis.

* * * * *

CTIA shares the Administration's aim to ensure U.S. leadership in AI. To achieve this goal, the United States will need ample licensed, full-power, commercial mid-band spectrum to support the unprecedented demands for data, speed, bandwidth, and next-generation wireless network functionality that innovators and users need to harness AI. As the Administration works to foster American AI leadership, it must prioritize developing and executing on a spectrum pipeline for the commercial mid-band spectrum necessary to power AI. CTIA welcomes further engagement with the Administration on this vital topic.

Please do not hesitate to contact the undersigned with any questions.

Sincerely,

Umair Javed

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