



February 10, 2021

Submitted via email to 5GChallengeNOI@ntia.gov

Rebecca Dorch
National Telecommunications and Information Administration
U.S. Department of Commerce
325 Broadway
Boulder, CO 80305

Re: Intel Corporation Comments on 5G Challenge Notice of Inquiry
Docket No. 210105–0001, RIN 0660–XC04

Ms. Dorch,

Intel Corporation welcomes the opportunity to provide comments to NTIA on the 5G Challenge in the above-mentioned proceeding. Intel is the largest global semiconductor supplier; our processors, memory, storage, and other products power much of the world’s computing capability. Intel is also a leader in 5G. As the world’s leading network silicon provider, one of our roles is to supply high volume and high-quality products to telecom equipment manufacturers. In 2020, we expanded our footprint into the Radio Access Network adding Xeon SoCs to our portfolio of FPGAs and custom solutions for 5G base stations. For 5G standards involvement, Intel employees hold leadership positions in 3GPP, IEEE, and the International Telecommunications Union. Intel is on the boards of the Telecom Infra Project and the Open RAN Policy Coalition and is a member of the O-RAN Alliance.

The 5G Challenge Notice of Inquiry utilizes the terms “open 5G stack” and “open source” implementations at various times. The mixed use of these terms can create unintended confusion around the objectives of the 5G Challenge. The Notice of Inquiry states that “A key innovation in 5G that is becoming more pervasive in the larger 5G ecosystem is the trend toward ‘open 5G’ architectures that emphasize open interfaces in the network stack.” NTIA’s goal is to create a 5G Challenge to accelerate this trend. To this end, NTIA should utilize language that is consistent with the goal of supporting interoperability for an open interface in the network stack and should avoid the use of terms such as “open 5G stack” or “open source.”

NTIA also questions “How could such a Challenge be structured to allow for the greatest levels of innovation?” The benefits of industry-led standards are well-known in terms of developing markets and delivering value to customers. Standards can enable interoperability, while still allowing for product differentiation. NTIA should take into



account the benefits of standardization as well as competition around product differentiation when trying to maximize innovation. The 5G Challenge should also take into account the work already being addressed by various organizations.

Intel appreciates the opportunity to provide these comments in response to NTIA's 5G Challenge Notice of Inquiry and looks forward to continued collaboration with NTIA.

Sincerely,

[/s/ Jayne Stancavage](#)

Global Executive Director,
Digital Infrastructure Policy