Marlene H. Dortch, Secretary

Federal Communications Commission

445 12th Street, S.W.

Washington, DC 20554

Re: Docket Number **RM-11791** – *Petition for Rulemaking to Amend and Modernize*

*Parts 25 and 101 of the Commission’s Rules to Authorize and Facilitate the Deployment*

*of Licensed Point-to-Multipoint Fixed Wireless Broadband Service in the 3700 – 4200*

*MHz Band*

Dear Ms. Dortch: 3 October 2017

For over 3 years now, Interstate Wireless inc (D/b/a Az Airnet), has been providing fixed wireless service to rural areas on Western Arizona. We have steady grown, and expanded the areas that we serve, bringing in much needed broadband to this area.

For the last few years, the FCC has required all broadband providers to file twice annual Form 477 reports on what areas we cover, and what speeds we provide.

The Commission and Congress have continually promoted the need for more coverage in the rural areas, but continue to fund and provide spectrum to those that are NOT doing so.

Why does the Commission not look at what is filed in the form 477’s, and see that the coverage in the real rural areas, is being done by small business WISP’s, and not the large cell, and ILEC companies.

We can continue to expand our rural coverages, and improve our speeds in those areas, if we can get additional spectrum to do so, and at costs that we can afford that spectrum.

The 3.7-4.2 ghz band fits the need on this additional spectrum !

It is currently licensed as Part 101, in 20 mhz channels. Most of what we provide service on to our end customers is on 20 mhz channels. Allowing the use of Point to Multi-Point service on this band could provide us with @ 24 channels to expand our coverage.

If the band can be lightly licensed, such as the licensing for Part 90 2-way radio, where a base station is licensed at a specific point, and then the mobile radios are a radius of that base station. The license should be coordinated, such as Part 90, to protect the existing Satellite receive locations on the band.

The 3.7-4.2 band would not need a SAS, or have the need for DFS protection of radar, and as such could be allowed some additional transmitted power output, to extend further into the rural areas.

If directional antennas were required at the base station, the frequencies could then be reused with better spacing.

As a current Grandfathered licensee of the 3.65 band, I have watched the new CBRS band being taken over by the cell carrier industry, to the point that a small business will almost have no chance of using that band to further bringing broadband into rural areas.

The FCC should give the cell industry their sought after 3.5 band, and then allow the real providers of rural broadband, the use of the 3.7-4.2 band. I would happily, and immediately give up my Grandfathered 3.65 spectrum for channels in the 3.7-4.2 band!

The current 5 ghz “Unlicensed” band, is getting trashed, by wholesale dumping of consumer “wideband” routers, that by default, are set to the highest power, and widest spectrum use available. This is slowly degrading the use of this band to provide good fixed wireless use, even in the most remote areas.

The Commission can reaffirm it’s commitment to wanting to provide better broadband to rural areas, by opening the 3.7-4.2 ghz band for PtMP use, and providing a licensing mode that small businesses can obtain it.

Wayne Markis

Interstate Wireless inc.

D/b/a Az Airnet