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251 CAMARILLO RANCH RD. CAMARILLO, CA 93012 | (888) 225-1571 |  
[WWW.GEOLINKS.COM](http://WWW.GEOLINKS.COM)

January 24, 2018

**VIA ELECTRONIC DELIVERY**

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12th Street, SW  
Room TW-A325  
Washington, DC 20554

**Re:**

*Promoting Investment in the 3550-3700 MHz Band, GN Docket No. 17-258;*  
*Expanding Flexible Use in Mid-Band Spectrum Between 3.7 and 2.4 GHz, GN Docket No. 17-183; and*  
*Connect America Fund Phase II Auction, AU Docket No. 17-182*

Dear Ms. Dortch:

On January 22, 2018, GeoLinks CEO Skyler Ditchfield and General Counsel and V.P. of Government Affairs and Education Melissa Slawson met with (1) Commissioner Brendan Carr and Legal Advisor Will Adams; (2) Wireless and International Advisor Rachael Bender (Chairman Pai's Office); and (3) Chief of Staff and Senior Legal Advisor Travis Litman and Legal Advisor Umair Javed (Commissioner Rosenworcel's Office). On the same day, Mr. Ditchfield and Ms. Slawson, along with Michele Farquhar of Hogan Lovells US LLP, counsel to GeoLinks, met with members of the Rural Broadband Auctions Task Force including Michael Janson, Thomas Parisi, Kirk Burgee, Chelsea Fallon, Alex Minard, Mark Montano, Heidi Lankau, Katie King, and Nathan Eagan.

On January 23, 2018, Ms. Slawson and Ms. Farquhar met with members of the Wireless Telecommunications Bureau Broadband Division (Blaise Scinto, Peter Daronco, Steve Buenzow, Paul Malmud, and Ariel Diamond) and the Mobility Division (Thomas Derenge and Jessica Greffenius). Later that day, Mr. Ditchfield and Ms. Slawson met with (1) Commissioner Mignon Clyburn, Senior Legal Advisor Louis Peraertz, and Legal Advisor Claude Aiken; (2) members of the Office of Engineering and Technology, including Julius Knapp, Ronald Repasi, Jamison Prime, Michael Ha, Nicholas Oros, Brian Butler, Barbara Pavon, and Bahman Badipour; (3) Commissioner Michael O'Rielly, Legal Advisor Erin McGrath, and Legal Advisor Amy Bender; and (4) Chairman Ajit Pai, Wireless and International Advisor Rachael Bender, and Wireline Advisor Jay Schwarz.

During these meetings, GeoLinks provided details about the Company's business and rapid growth as a fixed wireless Internet service provider (ISP) in both urban and rural areas throughout California. Leveraging its B2B success, GeoLinks has expanded its high-speed broadband offerings to reach schools and communities in rural parts of the state. To continue these efforts, the Company is seeking additional spectrum resources necessary to expand its growth and its rural connectivity. Specifically, the Company seeks the opportunity to acquire spectrum on a licensed or light-licensed basis or via a mechanism that will ensure smaller carriers have the opportunity to obtain spectrum use rights.

The GeoLinks representatives discussed spectrum issues affecting fixed wireless ISPs, the need for additional licensed spectrum opportunities for point-to-multipoint services, and positions advocated in GeoLinks' comments in the aforementioned pending spectrum proceedings.<sup>1</sup> The Company explained the challenge of operating on unlicensed bands such as 5 GHz in urban environments, where overcrowding can slow and disrupt service. GeoLinks explained that it could provide better and more reliable service, including Gigabit service to the home, if the Company had access to sufficient licensed or lightly licensed spectrum.

GeoLinks expressed concern regarding current spectrum allocation policies and the misuse and non-use of spectrum resources that is occurring today. GeoLinks expressed support for robust buildout and reporting requirements for any newly issued Priority Access Licenses.

Finally, GeoLinks' representatives discussed the Company's plans to apply for eligible areas via the Connect America Fund Phase II (CAF) auction. Representatives asked specific questions regarding the CAF application process and discussed other matters set forth in GeoLinks' comments and reply comments on the CAF Phase II Auction Competitive Bidding Procedures Public Notice, issued August 4, 2017.<sup>2</sup>

Pursuant to Section 1.1206(b) of the Commission's rules, I am filing this letter electronically in the above referenced dockets. Please contact me directly with any questions.

Sincerely,

*/s/ Melissa Slawson*

Melissa Slawson  
General Counsel and VP of Government  
Affairs and Education  
GeoLinks

cc: Chairman Ajit Pai  
Commissioner Michael O'Rielly  
Commissioner Brendan Carr

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<sup>1</sup> See generally comments and reply comments of GeoLinks, GN Docket No. 12-354, GN Docket No. 17-258, and GN Docket No. 17-183.

<sup>2</sup> See comments of California Internet, L.P. dba GeoLinks ("GeoLinks"), AU Docket No. 17-182, WC Docket No. 10-90 (filed September 18, 2017).

Commissioner Mignon Clyburn  
Will Adams  
Rachael Bender  
Travis Litman  
Umair Javed  
Louis Peraertz  
Claude Aiken  
Erin McGrath  
Amy Bender  
Jay Schwarz  
Michael Janson  
Thomas Parisi  
Kirk Burgee  
Chelsea Fallon  
Alex Minard  
Mark Montano  
Heidi Lankau  
Katie King  
Nathan Eagan  
Blaise Scinto  
Steve Buenzow  
Paul Malmud  
Ariel Diamond  
Thomas Derenge  
Jessica Greffenius  
Julius Knapp  
Ronald Repasi  
Jamison Prime  
Michael Ha  
Nicholas Oros  
Brian Butler  
Barbara Pavon  
Bahman Badipour