



AMERICAN PETROLEUM INSTITUTE

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**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)
) GN Docket No. 17-258
Promoting Investment in the 3550-3700 MHz Band;)

The Telecommunications Subcommittee of the American Petroleum Institute (“API”) submits this comment to the joint comments of Cambium Network, Energy Telecommunications and Electrical Association (ENTELEC), and the Utilities Telecom Council (UTC) - collectively “Respondents” - in response to FCC 17-258, a Notice of Proposed Rulemaking (“NPRM”) of Petitions for Rulemaking Regarding the Citizens Broadband Radio Service (“CBRS”).

API is a national trade association representing more than 625 companies involved in all phases of the petroleum and natural gas industries, including exploration, production, refining, marketing and transportation of petroleum, petroleum products and natural gas. Among its many activities, API acts on behalf of its members before federal and state regulatory agencies. The API Telecommunications Subcommittee evaluates and develops responses to state and federal proposals affecting telecommunications facilities used in the oil and gas industries. API is supported and sustained by companies that make use of a wide variety of wireline, wireless and satellite communications services on both a private and commercial basis. All wireless services used by our membership require RF spectrum resources, of both narrowband and broadband varieties.

API supports the Respondents’ position as it mirrors the joint response from API and ENTELEC to 17-258 with regards to retaining license area by census tract and not by Partial Economic Area (PEA). The example of the PEA 3 containing the city of Chicago that was referenced is another excellent example of a market whose PAL’s would become unobtainable due to economics by all but major telecommunication companies if licensing by PEA were adopted. The Respondents further emphasize that manufacturers such as Cambium who predominantly serve smaller carriers and Critical Infrastructure entities, including Oil & Gas, and Utilities (collectively “CII”), have invested in the CBRS band since the first NPRM in 2015. It is clearly recognizable that Cambium and other manufacturers in this arena would not be able to recapture that investment if CBRS was turned into a carrier’s band rather than one leveraged by CII, such as API members.

Finally, it should also be stated is that very much like the Respondents, members of API have also spent hundreds of hours each preparing for CBRS impact to their existing 3.65 GHz infrastructure. In addition, CII has also spent a significant amount of time on future planning for PAL acquisitions to support many

private broadband needs, for “last mile” and backhaul applications, based on the “rough” rules outline fostered since the inception in 2015. So API is in the same position to a degree with the Respondent’s that major rule changes at this stage would significantly reduce CBRS infrastructure investment from CII. It would stifle the innovative business plans that API members have created in anticipation of a CBRS offering, counter to the foundation of CBRS. We hope that the Commission will consider this ramification in its final rulemaking.

Respectfully submitted,

James Crandall

API