



March 27, 2020

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

Re: Comments of W.A.T.C.H. TV Company  
RDOF Bidding Procedures and Requirements  
AU Docket No. 20-34, WC Docket Nos. 19-126 and 10-90

Dear Ms. Dortch:

I write to express my concern that excluding fixed wireless technology as an acceptable solution for gigabit service in the RDOF program will limit rural Americans' access to this speed tier. Fixed wireless technologies have evolved substantially over the last two years and are now capable of delivering speeds and services that are complementary to fiber. The combination of fiber and fixed wireless technologies provides service providers with the tools to deliver gigabit services to rural Americans more economically than is possible with a pure fiber approach. This approach is consistent with the FCC's 5G FAST plan and furthers the Commission's goal of global leadership in the deployment of 5G technology.

W.A.T.C.H. TV Company (Watch) is an Internet Service Provider (ISP) and subsidiary of the Benton Ridge Telephone Company (BRTC), a rural telco founded in 1902 to provide telephone services in Benton Ridge and other small communities in Central Ohio. Watch provides high speed broadband services to residential and enterprise customers in Ohio, Indiana, Illinois, and Kentucky leveraging both fiber and fixed wireless technologies. Furthermore, the company was awarded approximately \$53 million from the Connect America Fund (CAF) II program which it is using to expand fixed broadband services to nearly 24,000 locations across three of our four states of operation. Watch will offer both 25/3 Mbps and 100/20 Mbps throughout our CAF II funded areas in accordance with our funding requirements.

Watch did not pursue CAF II support for the deployment of gigabit services. Our focus was on the deployment of 100/20 Mbps and 25/3 Mbps services in as many areas as possible, at the best possible price for rural Americans. The only feasible approach to delivering gigabit service at scale in 2018 was the deployment of fiber to every home and business. This approach did not make economic sense for rural America in 2018, and still does not make sense today. The correct approach is the complementary use of fiber and fixed wireless, leveraging the strengths of each technology where it makes both economic and technological sense.

Advancements in fixed wireless technologies over the last two years have changed the calculus for ISPs focused on rural America. Fixed wireless solutions that operate in 28 GHz, 60 GHz, 37 GHz and other millimeter wave (mmW) bands now offer both the technical capability and economic feasibility of delivering gigabit services in rural America. 60GHz point-to-multipoint solutions from Siklu and IgniteNet have already been deployed by Watch and other operators to deliver gigabit speeds. Manufacturers such as Cambium, Radwin, and Siklu are just months away from launching Terragraph-based solutions that utilize meshing capability to extend the reach and scale of mmW networks. Moreover, 5G technologies from Ericsson and other vendors are now available in licensed mmW bands including 28 GHz and 37 GHz, allowing operators to combine up to 800 MHz of spectrum that supports the delivery of gigabit services to both urban and rural communities. These fixed wireless technologies were not generally available in 2018, will soon be widely available and deployed, and should not be excluded from consideration under the RDOF rules.

Watch is actively deploying 4G technology from Ericsson that supports the transition to 5G when the complete ecosystem becomes available. This solution is being deployed primarily in the CBRS band for the delivery of 25/3 Mbps and 100/20 Mbps services to meet our CAF II obligations. However, Watch also acquired 1.9 GHz of 37 GHz spectrum across five Partial Economic Areas in the recently concluded Auction 103. We applaud Chairman Pai's leadership in holding both mmW auctions and for his focus on opening up more mid-band spectrum for 5G deployments. Watch will use its licensed spectrum to provide

services up to one gigabit in areas where we intend to seek RDOF funding. Moreover, Watch will utilize Terragraph-based solutions to do the same in areas where we did not acquire 37 GHz spectrum. The exclusion of fixed wireless as an acceptable solution for gigabit services in the RDOF program would substantially impact our ability to provide gigabit services to our rural target markets and is contrary to the goals established by the FCC in its 5G FAST plan.

Watch agrees with the FCC's position regarding the exclusion of experimental technologies that cannot meet the throughput and latency requirements of the gigabit tier in the RDOF program, or are not proven in a commercial environment. Commercial fixed wireless solutions are now capable of providing gigabit services and should not be excluded by rule. The categorical exclusion of fixed wireless will limit the number of Americans that may be covered by the RDOF program, unnecessarily drive up the cost per user for the deployment of gigabit services in some areas, and ignore the evolution of fixed wireless technologies that has occurred over the last two years.

Sincerely,

A handwritten signature in blue ink, appearing to be "CD", with a long horizontal stroke extending to the right.

Chris Daniels

President & CEO

W.A.T.C.H. TV Company