

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
)	
Status of Federal Government Relocation From)	WT Docket No. 18-104
AWS-3 Bands)	
)	

**COMMENTS OF CHESTER TELEPHONE COMPANY, FTC MANAGEMENT
GROUP, INC. AND SANDHILL COMMUNICATIONS, LLC**

Chester Telephone Company (“Chester”), FTC Management Group, Inc. (“FTC”) and Sandhill Communications, LLC (“Sandhill” and together with Chester and FTC, the “Rural AWS-3 Licensees”), by counsel, hereby submit these comments in response to the Public Notice (“Notice”) issued by the Federal Communications Commission (“Commission”) Wireless Telecommunications Bureau (“Bureau”) seeking comment on whether to recommend an extension of the initial license term and associated buildout deadlines for AWS-3 licensees.¹ For the reasons explained herein, the Rural AWS-3 Licensees strongly encourage the Bureau to recommend that the Commission extend the initial license term and associated buildout deadlines for all AWS-3 licenses by three (3) years.

The Rural AWS-3 Licensees and their parent companies provide wired and wireless broadband services to portions of rural areas of South Carolina. The Rural AWS-3 Licensees acquired their AWS-3 licenses in Auction 97² and their licenses were among the earliest-issued by the Commission, which means their buildout deadlines are also among the earliest. Sandhill,

¹ Public Notice, Wireless Telecommunications Bureau Seeks Comment on Status of Federal Government Relocation from AWS-3 Bands, DA 18-346 (rel. April 6, 2018).

² Chester holds one AWS-3 license, call sign WQXW409. FTC holds two AWS-3 licenses, call signs WQVP467 and WQVP468. Sandhill holds one AWS-3 license, call sign WQWU316.

for example, was granted its license on November 19, 2015 and is required to meet its interim buildout by November 19, 2021. Each licensee is exploring using its license to provide much-needed broadband access to underserved residents and businesses in rural South Carolina. FTC has applied for Connect America Fund Phase II (“CAFII”) funding and plans to use its AWS-3 license to provide 10/1 or greater broadband service to underserved CAFII census blocks should it be awarded the funding.

Given the existence of government incumbents in the band, a three-year extension of the initial license term and associated buildout requirements would provide AWS-3 licensees the appropriate amount of additional time to deploy services. While federal agencies appear to be working diligently to relocate their operations, commercial AWS deployment has nonetheless been slowed by the federal government relocation process. The Commission’s rules require AWS-3 licensees to protect and accept interference from federal operations in the 1755-1780 MHz band until the federal operations vacate the band.³ AWS-3 licensees must also coordinate with the relevant Federal incumbent prior to operating.⁴ These encumbrances on the AWS-3 spectrum have slowed the development of the AWS-3 ecosystem and added to the difficulty rural carriers face in deploying services on any spectrum band. Specifically, in addition to challenges regarding the lack of availability of affordable equipment, rural carriers must also overcome challenging terrain, spread out and sparse populations, and shortage of tower collocation opportunities all with a tight budget.

Accordingly, the Rural AWS-3 Licensees realistically must wait out the federal transition instead of rushing to deploy services that require additional expense, prior coordination and possible interference. This wait time will mean that, unless granted a three-year extension, the

³ 47 C.F.R. § 27.1134.

⁴ *Id.*

Rural AWS-3 Licensees will have a much shorter timeframe to meet already challenging buildout deadlines. Accordingly, the Rural AWS-3 Licensees strongly encourage the Bureau to recommend that the Commission grant a three-year extension of the initial term and associated buildout deadlines for *all* AWS-3 licenses. Alternatively, the Rural AWS-3 Licensees request that the Bureau recommend a three-year extension for the earliest granted AWS-3 licenses (those granted in 2015 or 2016).

In light of the federal transition and given the challenges traditionally faced by rural carriers, a three-year extension of the initial license term and associated buildout deadlines for all AWS-3 licenses is warranted. The Rural AWS-3 Licensees urge the Bureau to recommend such an extension for all AWS-3 licenses, or in the alternative, for the earliest granted AWS-3 licenses (licenses granted in 2015 or 2016).

June 5, 2018

Respectfully Submitted,

A handwritten signature in black ink, appearing to read 'Donald L. Herman, Jr.', with a long, sweeping flourish extending to the right.

Donald L. Herman, Jr.
Clare Liedquist
Counsel for the Rural AWS-3 Licensees