

Before the  
**FEDERAL COMMUNICATIONS COMMISSION**  
Washington, DC 20554

In the Matter of	)	
	)	
Expanding Flexible Use of 3.7 GHz to 4.2 GHz	)	GN Docket No. 18-122
Band	)	
	)	

**REPLY COMMENTS OF FRONTIER COMMUNICATIONS  
CORPORATION, WINDSTREAM SERVICES, LLC, AND  
CONSOLIDATED COMMUNICATIONS, INC.**

Frontier Communications Corporation (“Frontier”), Windstream Services, LLC (“Windstream”), and Consolidated Communications, Inc. (“Consolidated”) hereby submit these brief reply comments to the Commission’s *Public Notice* seeking comment for the Commission’s upcoming Making Opportunities for Broadband Investment and Limiting Excessive and Needless Obstacles to Wireless Act (MOBILE NOW Act) report addressing the feasibility of allowing commercial wireless services to use or share use of the 3.7-4.2 GHz spectrum band.<sup>1</sup> Like other parties in the docket, our companies request that the Commission incorporate by reference our comments in the *Mid-Band Spectrum Notice of Inquiry* and Broadband Access Coalition Petition for Rulemaking proceedings.<sup>2</sup> Our companies believe that expeditious access to the 3.7-4.2 GHz band spectrum for rural fixed point-to-multipoint deployments are entirely feasible,

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<sup>1</sup> *Office of Engineering and Technology, International, and Wireless Telecommunications Bureaus Seek Comment for Report on the Feasibility of Allowing Commercial Wireless Services, Licensed or Unlicensed, to Use or Share Use of the Frequencies Between 3.7-4.2 GHz*, Public Notice, GN Docket No. 18-122 (May 1, 2018).

<sup>2</sup> *See Comments of Frontier, Windstream, and Consolidated*, GN Docket No. 17-183; RM-11791; *see also Expanding Flexible Use in Mid-Band Spectrum Between 3.7 and 24 GHz*, Notice of Inquiry, 32 FCC Rcd 6373 (2017) (“*Mid-Band Spectrum NOI*”); Petition for Rulemaking of the Broadband Access Coalition, RM-11791 (June 21, 2017) (“*BAC Petition*”).

and the ability to deploy fixed wireless would provide another key tool in the toolbox to reach the hardest to serve rural Americans.

As demonstrated by several parties in the record, including especially Google and the Broadband Access Coalition,<sup>3</sup> sharing between existing 3.7-4.2 GHz Band operations and fixed wireless is entirely possible and achievable in the very near term, particularly in very rural areas. While our companies also have C-Band operations<sup>4</sup> and recognize the importance of protecting incumbent operations (or adequately and fully compensating parties in the event of relocation), Google and the Broadband Access Coalition's technical showings and the experience so far in the 3.5 GHz Band demonstrate that sharing between incumbents and fixed deployments can be done.

Indeed, as Google, for example, explains, relatively “lower-power [fixed] services can immediately coexist with [fixed-satellite service (“FSS”)] operations, providing gigabit-class broadband service to American homes and businesses without causing disruption to FSS.”<sup>5</sup> This dynamic is especially true in rural areas, where there are comparatively many fewer earth stations and much more opportunity to achieve separation and coordination.<sup>6</sup> With relatively fewer rural sites and existing technology and techniques, including directional antennas, frequency-agile systems, spectrum access systems, and geographic isolation, immediate sharing

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<sup>3</sup> See, e.g., Comments of the Broadband Access Coalition, GN Docket No. 18-122 (May 31, 2018); Comments of Google LLC, GN Docket No. 18-122 (May 31, 2018) (“Google Comments”).

<sup>4</sup> Frontier, for example, has cable headends relying on the 3.7-4.2 GHz Band.

<sup>5</sup> Google Comments at 4.

<sup>6</sup> See *id.*

of the spectrum can be readily achieved.<sup>7</sup> Given the feasibility of these operations coupled with the imperative of rural broadband deployment, there should be no delay in enabling fixed point-to-multipoint deployments in the band in rural areas.

At the same time, immediately enabling this spectrum for rural fixed point-to-multipoint use would not foreclose other intensive uses in the future. Today, there is a relative spectrum abundance in rural America, and this mid-band spectrum, which is perfect for providing robust capacity, is more likely to be intensively used by mobile carriers in urban and suburban, rather than rural, areas. Accordingly, the Commission can permit fixed wireless deployment now and allow a spectrum access system to mediate coexistence of other uses at a later date. With the massive benefits that fixed point-to-multipoint use can bring to rural America today, the Commission cannot afford delay.

Time is especially of the essence for our companies as we are in the process of investing more than three billion dollars to bring broadband to more than a million homes and businesses (representing more than two and a half million Americans) as part of Phase II of the Connect America Fund (“CAF”) program. Given this massive scale of investment – scheduled through year-end 2020 – making this spectrum available as quickly as possible would enable our companies to provide broadband to more Americans, especially in the most rural parts of our footprints. This underutilized spectrum presents the Commission with a rare opportunity to further promote rural broadband expansion.

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<sup>7</sup> *See id.* at 4-6.

## CONCLUSION

Sharing in the 3.7-4.2 GHz Band is feasible, especially for fixed deployments in rural areas. As the Commission is making substantial CAF investments to extend broadband to unserved rural Americans, it really has a prime opportunity to accelerate those multi-billion dollar investments. Authorizing point-to-multipoint fixed broadband deployments in the fastest possible timeframe in the 3.7-4.2 GHz Band would pay great dividends for rural broadband and enable companies to unleash faster broadband for an even greater number of rural Americans.

Respectfully submitted,

/s/ AJ Burton

Thomas Whitehead  
WINDSTREAM SERVICES, LLC  
1101 17th Street, NW, Suite 802  
Washington, DC 20036  
(202) 223-7664

AJ Burton  
FRONTIER COMMUNICATIONS  
1800 M Street, NW, Suite 850S  
Washington, DC 20036  
(202) 223-6807

Michael T. Skrivan  
CONSOLIDATED COMMUNICATIONS, INC.  
1 Davis Farm Road  
Portland, ME 04103  
207-535-4150

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