



Countrymen Communications, Inc

July 3, 2019

Chairman Ajit Pai  
Federal Communications Commission  
445 12th Street SW  
Washington, D.C. 20554

Re: *Transforming the 2.5 GHz Band*, WT Docket No. 18-120

Dear Chairman Pai,

I would like to take a few minutes to express my viewpoint as a rural carrier on the Educational Broadband Services (EBS) Spectrum and urge you to leave that spectrum as an educational-licensed frequency. I operate a small WISP in Greenbrier County, WV and have accumulated 160 customers in a year by mainly word of mouth. “What do you do for internet” is a common topic here.

I want to emphasize that the crux of my issue is not what we hold and are at risk of losing, but what we have never been offered in West Virginia by the FCC that other states already have access to. And more importantly, that item – EBS spectrum – that we have not been offered, is the current best solution for broadband in West Virginia.

The points I want to focus on are:

- Other states have been given the opportunity to see what this spectrum is capable of, and those states aren’t the mountainous regions where this spectrum could have the greatest impact. West Virginia needs the same opportunity as the more populous areas.
- The 2.5 GHz spectrum has some special characteristics. I won’t go into a technical discussion, but the frequency combined with the 5G equipment for sale in that spectrum allows for a combination of penetration, speed, and affordability. You can get the signal further, carry broadband speeds, and be a fraction of the cost of any of the other current options for delivery.
- The 2.5 GHz band is currently being used for broadband today. Economies of scale exist, equipment is affordable, and companies like mine can quickly acquire and install it to deliver real broadband in a matter of weeks – not months or years.

- The FCC allowing this spectrum to go to public auction hurts West Virginia in several ways:
  - Educational institutions don't have the opportunity to apply; in turn, they lose the revenue from the lease; they don't get to pick the carrier most interested in serving their county; they don't get to negotiate items of interest to them (i.e. free service for a library, low-cost programs for families with schoolchildren etc.).
  - If the FCC sells the spectrum, schools will be denied not only potential revenue but also services because they will no longer be required under FCC rules.
  - Small carriers most willing to serve remote rural areas don't have the capital to participate in an auction. You have to have the up-front cash. Many providers simply will not be able to participate. Even if they would, the cash necessary to purchase a license would already be spent, making the ability to build out service greatly hindered.
  - WV needs more small businesses training employees in technology. Small carriers are the people who live here and truly understand the frustration of unusable internet, the fear our children are being left behind in technology, and wondering where are children are going to work in 10 years. How many businesses are we attracting when WV can't offer reliable affordable internet?
  - The largest national carriers already have access to over 625 MHz of spectrum in West Virginia, yet they simply aren't building it out. Some of the larger companies benefit from no one building out something more affordable. AT&T hot spot for 20 gig cap = \$100. (We know families who had to have 4 hot spots in order to maintain their professional work obligations). Verizon Wireless hot spot with 100 gig cap = \$710 per month.
  - Public auction requires up-front money; In the general scope of things, companies with large amounts of capital are larger companies with investors as shareholders and a lot of overhead; Investors expect ROI. As we already know, the ROI on taking broadband to residences in WV is minimal (negative) which is why no one is doing it and its been subsidized by the government. Large companies sell telecom, WV wants better broadband access, so why is no one supplying this demand? Because there's no ROI. Now that same large carrier is at a double loss- they lose the money from the hot spot and the ROI drags down their profitability per customer. They could be better off to buy the license and hold it.
  - We have seen WV get left behind by big carriers even though they had a license for the county. In the early 2000's, after Raleigh, Mercer, Fayette and surrounding counties had cellular service for years, AT&T relinquished their rights in Wyoming and McDowell counties for the 850-900 megahertz license (cellular phones). The license had gone unused for years. At the time, I worked for Highland Cellular (trade name Cellular One) based in Beckley, WV. Highland applied to the FCC for those licenses and then built towers and took cell phone service to Wyoming and McDowell counties.

- The concept of “policing” and fining large carriers that don’t meet build out and service requirements in WV is unrealistic and ineffective. If you were to ask Senators Capito and Manchin, the Public Service Commission, or WV Division of Homeland Security how that concept is proving to work out with Frontier and 911 Call Centers, they could tell you about the number of Public Service Complaints that have been filed over the ability to make a 911 call, and the Center’s abilities to receive the calls.

The best solution for West Virginia is for the FCC to issue new EBS licenses to local educational entities. The 2.5 GHz spectrum was reserved by the FCC in 1963 for Educational usage. The FCC has offered the spectrum twice, **but never in West Virginia**. (There are a few slivers of this spectrum in portions of a few perimeter border counties, but it was not offered as an entire county within the whole state). On the other hand, the FCC has offered other spectrum to large carriers, and what we saw is that the places with the largest ROI got served first, and sometimes they were the only places served. With build-out in the 10-12 year range, how fast are we likely to see any results in rural West Virginia?

Countrymen Communications has already developed partnerships with local schools in the areas we serve. If given the opportunity, schools could apply and lease this spectrum to Countrymen. We would be financially supporting the school while also providing high speed internet service to the school, the local community, tourist attractions, and local residents.

The incentive to build out broadband in West Virginia is not based on the income derived from the investment. No big carrier is going to come out ahead from building here. They have large overhead, they have dozens of VPs and Directors, and are just too big to move swiftly. It’s historically proved to be costly. Will they charge high dollar amounts to make up for the overhead? So what is the incentive? How do we get someone to do it? Funding from the government to continue to pump millions into the same technology? How many years and millions of dollars have gone by, with no distinguishable difference in the number of people served? So what is the incentive that gets a company to build here? Put it in the hands of the people that live here; people who want more than a financial return; people who are motivated by the education of our own children and the economy that will decide if they stay here or move away. Don’t let that spectrum become too expensive for small carriers to afford.

I strongly urge you to support West Virginia schools and providers like Countrymen Communications to prove we can and will serve our neighbors and friends. I appreciate your attention to this matter.

Sincerely,

Carrie Scott  
CEO  
Countrymen Communications

Cc: Commissioner Brendan Carr  
Commissioner Michael O’Rielly  
Commissioner Jessica Rosenworcel  
Commissioner Geoffrey Starks