

**Before the
Federal Communications Commission
Washington, DC 20554**

In the Matter of)	
)	
Amendment of Part 90 of the Commission's)	WP Docket No. 07-100
Rules)	

COMMENTS OF CALIFORNIA INTERNET, L.P. DBA GEOLINKS

California Internet, L.P. DBA GeoLinks (“GeoLinks” or the “Company”) submits these comments in response to the Commission’s Sixth Further Notice of Proposed Rulemaking in the above-captioned proceeding.¹

I. INTRODUCTION AND SUMMARY

GeoLinks is proud to service the largest coverage area of any single fixed wireless Internet service provider in the state the California. The Company’s fixed wireless technology platform depends on access to spectrum resources sufficient to support enterprise-level broadband connections. However, to date, access to dedicated spectrum resources has been difficult for small and mid-sized companies, such as GeoLinks. In addition to other bands for which GeoLinks has advocated spectrum policies that would allow fixed wireless broadband providers to obtain spectrum, GeoLinks believes that the 4.9 GHz band offers a means to allow providers to access this vital resource in a way that also protects incumbent public safety users.

II. DISCUSSION

A. The Commission Should Allow Sharing of the 4.9 GHz Band on a Licensed or Light-Licensed Basis

In the FNPRM, the Commission seeks comment on ways to “stimulate expanded use of and investment in the 4.9 GHz band” and proposes to implement a sharing mechanism to “promote more opportunistic use of the 4.9 GHz band without compromising the integrity and

¹ *Amendment of Part 90 of the Commission’s Rules*, Sixth Further Notice of Proposed Rulemaking, WP Docket No. 07-100, FCC 18-33 (rel. March 23, 2018) (“*FNPRM*”).

security of public safety operations.”² GeoLinks believes that allowing commercial users to share the band on a secondary basis to public safety licensees would be the most appropriate and most effective use of the band to reach the Commission’s goal. Specifically, GeoLinks asserts that such sharing should be allowed on a licensed or light-licensed basis.

As GeoLinks has explained in numerous filings, point-to-multipoint (“P2MP”) service options are ideal because they allow a wireless service provider to provide high-speed broadband connections to several end-users (i.e. several households throughout a community) from one location, requiring fewer towers and less equipment than point-to-point (“P2P”) connections. If sufficient spectrum is available, providers can use P2MP technology to deliver gigabit and near-gigabit speeds to customers. In addition, because P2MP services are wireless, use of this technology eliminates the need for costly, time-consuming and disruptive construction that is generally associated with fiber buildouts. This is especially beneficial in rural and high-cost areas and can provide much-needed competition to incumbent providers in urban and suburban areas.

Uncertainty regarding how and where and when spectrum will be used by other users makes it difficult to efficiently manage P2MP connections over longer distances, requiring providers to utilize shorter P2P connections to avoid interference, which are less efficient and more expensive to deploy. This is especially true in unlicensed bands. However, under a licensed or lightly-licensed sharing regime with the appropriate frequency coordination in place, commercial users, such as fixed wireless providers, can utilize available spectrum to provide these high-quality, P2MP broadband connections without the risk of causing or receiving harmful interference. GeoLinks believes that this approach should be applied to the 4.9 GHz band.

B. Successful Sharing of the 4.9 GHz Band Requires Adequate and Accurate Information to Ensure Efficient Frequency Coordination

Sufficient frequency coordination paired with a licensed or light-licensed regime would allow secondary users to operate P2MP (or P2P) wireless connections in the band without the risk of interference to primary, public safety users. As an initial matter, GeoLinks agrees that

² FNPRM, at para 3.

any changes made to use within the 4.9 GHz band should not force incumbent licensees to modify, abandon, or replace existing 4.9 GHz facilities.³ GeoLinks (as well as other wireless broadband providers) can coordinate its use of a frequency around any fixed point (i.e. the transmission path of a primary licensee) or around any primary use that may be necessary to avoid harmful interference. However, in order to ensure successful coordination so that incumbent licensees are protected, additional users of the band must know where within the band incumbents are operating. Therefore, GeoLinks agrees with the Commission's proposal that incumbent licensees whose authorizations currently encompass the entire 4.9 GHz band must certify the channels they actually use and input this information into a frequency coordination database (along with transmitter and receiver parameters).⁴

C. The Commission Should Require Strict Buildout Requirements for Any New Users of the 4.9 GHz Band.

As GeoLinks has advocated in previous filings, any spectrum license should carry with it the requirement to serve the public interest – including for shared or light licensed spectrum. Spectrum is, first and foremost, a public resource and should be allocated accordingly. Similar to its recommendations for other bands, GeoLinks proposes that the Commission impose minimum buildout requirements for any commercial licensee utilizing the 4.9 GHz band. Specifically, GeoLinks recommends that this minimum be set high enough to ensure that unserved areas (if applicable) within any license area are not left behind. GeoLinks believes that these requirements will encourage use of the 4.9 GHz band by commercial users serious about deploying high-speed broadband services and alleviate any risk of spectrum warehousing. In addition, GeoLinks urges the Commission to implement a reporting process to track whether buildout requirements are met (and met properly).

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³ FNPRM at para 11

⁴ *Id.* Moreover, GeoLinks agrees that only those channels for which information has been supplied should be afforded protection.

III. CONCLUSION

Based on the foregoing, GeoLinks urges the Commission to allow for commercial use of the 4.9 GHz band on a secondary basis under a licensed or light-licensed sharing approach.

Respectfully submitted,

GEOLINKS, LLC

/s/ Skyler Ditchfield, Chief Executive Officer

/s/ Melissa Slawson, General Counsel/ V.P of Government
Affairs and Education

July 6, 2018