

Broadband Access Coalition
3.7 GHz Band Petition for Rulemaking (RM-11791)

Suggestions for Filing Comments in Support of the Petition
Deadline: Monday, August 7 at 11:59 pm EDT

General Guidelines

- Here is a link to the Petition: <https://ecfsapi.fcc.gov/file/1062353270786/17062202-1.pdf>
- File comments unique to your company, not “cookie-cutter” comments parroting the Petition
- We are happy to work with you and/or review your comments and provide suggestions
- Instructions for filing your comments are set forth on the final page of this memo
- **Story lines and hard facts specific to your business are highly useful. See specifics below.**
- This is a political issue, not a legal issue
- General support for the Petition is fine:
 - “We strongly/enthusiastically support the Petition”
 - Access to the 3700 – 4200 MHz for P2MP services would enable us to”
 - The Commission should move ahead quickly to issue a Notice of Proposed Rulemaking (NPRM)
- For rural providers: focus on extending fixed broadband service to rural Americans that lack broadband or choice

Key Story Lines for Wireless Internet Service Providers, Other Broadband Access Providers and Vendors

Introduce your company

- How many customers do you have?
- What part(s) of the country do you serve? How rural is the area you serve?
- What service do you currently offer (e.g., speed)?
- What service would you like to offer?
- What are customers asking for?

Discuss the following challenges that you face:

- Access to adequate and reliable spectrum:
 - Inadequate channel bandwidth in 5 GHz and other spectrum bands – and resulting inability to provide service above xx Mbps and/or expand into new areas
 - Congestion from (other) unlicensed users – inability to provide QoS; impact on throughput; impact on cost of providing service (if any)
 - Need for protected spectrum to ensure QoS and attract investment
- Coverage issues:
 - Line of sight issues – to demonstrate why 3700 – 4200 MHz band would be much more effective than the spectrum you are currently using

- Talk about current LOS issues and how it affects your coverage, cost of providing service, data rates
- Cost issues:
 - Why purchasing spectrum at an auction would be prohibitively expensive – don't just say it, but provide empirical support, if possible
 - Empirical data showing that fiber wireless hybrid is economically viable and how it would help you to expand your customer base
- Service offerings:
 - What service packages (speed and cost to consumer) could you offer if you had access to 20/40/80/160 MHz of lightly licensed spectrum. Ideally, at least 100/10 Mbps. If it's less than 50/10, probably best not to be specific.

Key Story Lines for Community Anchor Institutions and Consumers

Lack of Broadband and/or High Prices for Low Speeds and/or Low Monthly Data Caps

- What is offered in your area? Price and throughput offerings/monthly data caps
- If there is only one non-satellite provider in your area, please say so.
- Is your community served by fiber? By a cable broadband provider?
- Why the offerings of the current provider(s) do not meet your needs: too expensive, unreliable, inadequate throughput
- How the lack of broadband is negatively impacting your community/how better and/or cheaper broadband would positively impact your community

INSTRUCTIONS FOR FILING YOUR COMMENTS WITH THE FCC IN RM-11791

Comments can be prepared as a double-spaced document with a caption, or as a single-spaced letter

Comments are filed electronically at the FCC's ECFS web site: <https://www.fcc.gov/ecfs/filings>

Proceedings: RM-11791

Name of Filer: enter your company's name, not your name

Type of Filing: pull down menu, enter "Comment" right at the top of the menu

File Number, Report Number, Bureau ID number: leave these blank