* 1. **GHz Band Petition for Rulemaking (GN-12-354)**

We are a Fixed Internet Service Provider in Oregon / Washington and we **oppose** this Petition. We are currently licensed and offer services in the 3.65 GHz band (50 MHz), with a small customer base of 1250 customers. It is important and necessary for us to increase the available bandwidth per customer, and it is strongly urged by the FCC. Currently with the limited bandwidth available it is very difficult to offer more then 10/5 for these multi-point services. The 900, 2.4, 3.65, and 5 GHz bands are extremely overloaded and continually require monitoring to protect our customer throughput and bandwidth. We are a leader in fixed wireless broadband services we could greatly benefit by added bandwidth increasing our service offerings beyond 100/10 Mbs. More efficient equipment and increased bandwidth offers the only opportunity to be a better service provider within Rural America.

Our investments in wireless have been very extensive and well over 1 MM in site acquisition and the build of our wireless network. We are currently offering services off 45 sites within Oregon and Washington with all licensed backbone and point to multi-point services. Being able to offer higher bandwidth to these customers requires large continued investments and must be supported by the FCC. In closing this is going to make it difficult for us, a smaller carrier, to compete in the large player arena for this additional bandwidth.

Large companies will definitely have advantages of additional capital over the small independent companies like Columbia Energy. The higher bandwidth customers currently require P-t-P to achieve speeds of 100/100Mbs. Installing equipment for P-T-MP would be greatly appreciated and would allow us to do something we have never been able to offer previously which would be a higher bandwidth to every customer with low latency, and not the selected few.

Our customers do not have access to services that suburban customers have available. Our rural customer needs access to the higher throughput that could be achieved through more available bandwidth. Therefore I believe it would be in the consumer’s best interest to have access to extended bandwidth with less interference.

As a small rural access provider we currently do not have the ability to compete with larger carriers in the spectrum auctions and do not have the ability to spend millions of dollars to compete and offer these services in the rural markets. Our average customer is several miles from the closest tower and usually their neighbor. We do not spend thousands of dollars on advertising as it is money better spent on service. Rural service is extremely unfriendly to long haul links and does not perform well over extended ranges with low latency. When you have more towers you engineer everything for overall performance to each customer. Rural America needs this NPRM, and our ability to offer better throughput and quality of service. What they do not need is increased price because of Spectrum Auctions.