July 19, 2017

Federal Communications Commission

Washington, DC

RE – Comments on RM-11791

Clifton Communications, LLC is a service connected disabled veteran owned business. We are in process of starting a WISP to serve the currently unserved population of eastern Greene County and the adjoining rural areas of Clark, Fayette, Ross and Clinton counties. We currently have zero customers but we have hundreds who have expressed a desire to be our customers because they have no other broadband options. We know that our potential service area encompasses over 700 square miles and tens of thousands of customers who have no access to broadband connectivity. Multiple this by the rest of rural Ohio and the county and there are tens of millions of citizens who remain under or totally unserved by broadband.

Serving my neighbors will not be simple. There are terrain and foliage issues that complicate service. The relatively low density precludes expansion of cable and fiber optic. That leaves over the air spectrum of the only viable option. The big phone companies have sucked up the 2.5GHz licenses but they will not populate the rural areas with service. That leaves small business and start-ups to fill this need and the 3.65 GHz spectrum as the sweet spot.

The need for spectrum to serve these citizens is great. If the Citizens Broadband Radio Service petitions from the phone companies are approved the loss of spectrum will severely impact my neighbors and all of rural Ohio and America. Service dispersed customers with fast net connections requires spectrum and there isn’t enough to go around. I was really looking forward to using the CBRS spectrum to better serve my neighbors. I have plans for a 5 tower network that will cover the 700 square mile area with service of 25 MBs or better. If the CBRS spectrum is removed, the number of citizens I will be able to serve will be significantly reduced.

Please do not approve the phone company petitions and allow the CBRS to remain available for use by small business WISPs.

Sincerely,

Zot

Zot Barazzotto

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