

To the Commission:

We (InvisiMax Inc.) Dave Giles, Pres. / Owner am in **Strong Support of 3.7 GHz Band Petition for Rulemaking (RM -11791)**, filed by the Broadband Access Coalition.

- * I Strongly and enthusiastically support the Petition.

- * Access to 3700-4200 MHz for P2MP services will allow us to enhance our services, to the customer base we have, allowing us to surpass the basic 25/3 broadband speeds (building for tomorrow) it will allow us to grow, increase coverage area, & service our rural area with the personal and dedicated support needed of our demographics.

- * I urge the Commission to move quickly to a Notice of Proposed Rulemaking

- * Our rural areas need and desire, you the Commission to support them to not only get them broadband, but to have more than "basic broadband" and Choices, multiple providers and technologies. That is why I support this petition.

Our Story – InvisiMax Inc.

We are a WISP located in rural Minnesota and North Dakota. We currently service 4112 customers and are growing every day, (even as we continue to reinvest in our customers by upgrading their service, we grow). We have been in business for 17 years. We employ 20 people. We serve about 75 rural communities and cover about 14,000 square miles. Our area and demographics are extreme, we service single dwelling rural homes to extremely large rural businesses. We serve many Americans that work remotely, we serve Grandma and Grandpa that connect to Grandchildren remotely, we serve large family and corporate farms, rural manufacturing and donate services to rural emergency response (fire depts. & ambulance) and small community centers. With 4,000 + customers we estimate we serve more than 30,000 computers and close to 100,000 devices (I will expand on this). THIS is impacting America.

We currently only offer packages of 5/2 Mbps and up to 25/5 service for "regular packages". We currently provide anything between that regular package to 100/100 packages by special order and agreement. We have many "dedicated" services for special needs business. We are not able to offer special packages to all areas (the reason we need more spectrum). We expect today's "special packages to be tomorrow's regular", with your help we can achieve that. Most our customers want "cost effective" connections. Today much of our customers do not choose to pay more for larger packages, the difference of \$50 - \$60 per month can many times stop or limit a customer from experiencing or using broadband as it could be. They want to "buy what they need and use". Our job is to continue to increase these packages so they grow into a need and use, that will benefit them and America by using it. All our packages have always been unlimited data. Other companies charge "what the market will bear" and then when competition gets tight they start giving unlimited packages (many times with other restrictions or changes after certain levels of data use)

Customer Needs. Just to expand on what the customers need and expect. In our rural areas, they do need increase speeds and expect service. We will continue that with additional spectrum. Why? Obviously more devices, more use, but also, we the WISP (broadband carriers) are now delivering services for many other industries. Cell companies have had 30+ years to get coverage to many of our

areas and have failed to do that, (some areas still 1G or no service) so when our customers walk into their homes and businesses all their mobile devices connect to their Wi-Fi (we support) and then our Fixed wireless connection now carries all their cell calls. Cell companies, no doubt want more spectrum for more volume but have failed to get simple coverage, much less speed. Other industries, like TV services i.e. Netflix, pay service entertainment or communication are served by us connects. They pay others for content (the subscription) but we deliver it, which we are happy to do (no data caps). What brings our value is "support" to our customer base. Customer need, in our area is more than "a big pipe connection" it is support. We can serve our customers better by being local, we are also a "choice" for them. Expanded and additional spectrum allows us to stay extremely close to our customers "helping them grow". Customer needs- we are also carrying "regular phone" services. With IP phone systems, they are now able to have "choices" verses only the local carriers. We can assist them with their choices and or phone services, many times VPN connection to a business or job in a different geographic location. There is much more of this, too numerus to explain now.

100,000 devices our customers use. although that number can be challenged I bet it is not far off from the 4,000 paying accounts we have. A typical customer home now has 10 devices connected all the time with an extreme customer whom has just under 50 devices in their home connected. Customers will grow and use it if we can provide it.

Spectrum and Coverage – I thank the forward thinking of the Commission in the past for opening unlicensed and licensed light spectrum. This has REALLY helped rural America and all of America in my opinion, allowing entrepreneurs to start businesses and for WISPs connecting and educating our rural customer base with technology, grows and supports the economy, and more important, innovation. Making additional spectrum available, (affordably) for companies like ours accelerates this.

We have used all or most of the affordable spectrum choices available to us. Unlicensed or Licensed light 900Mhz, 2.4GHz, 3.65GHz, 5GHz, 24GHz. Affordable licensed frequencies 11GHz, 18GHz, 23GHz. Line of site are issues most places, so additional spectrum in the 3700-4200 not only helps us to "bond channels" to get faster speeds and more capacity, it is Extremely important for non-line of site situations with the capacity needed.

Additional spectrum helps us serve our customer's needs. Big investments have been made for FTTH (Fiber to the home). In our areas that is not economic or even if it is decided it is an economic value, to our customers it is just another end point. Our Farmers and rural people many times do not have their offices in their homes. They are in remote offices, in farm yard Shops, across yard or parking lot, many times the fiber will terminate in a location it only supports a few devices. Again, as a WISP we need spectrum to take it from the farm to every Acre. We truly support and need all types of connections but we also need affordable spectrum for our customers to "use" the connections they have, that being fiber or DSL or even mobile wireless. Although one could say well that is what mobile 5 G will do for all of America, revert to my opening comments of, in 30 years we do not have coverage where our customer need to call today.

Investment – in seventeen years we have invested more than \$8 million dollars into our little network, majority in the last few years. We have done that with ZERO USF, government grants or subsidies. This investment has been all customer driven revenue. All, in areas that already have communication companies that are subsidized to offer these types of services. That must tell the commission that competition is good. Competition increases "service" to customers. My wife and I are the sole investors/

shareholders in our company. We live comfortably but have reinvested all profit and more into our company. We are blessed to have a local bank that believes in us and have used the SBA program to grow our business. We have not been successful in USDA or RUS funding or other type of Programing, as there tends to always be a challenge for a WISP. We are not an ILEC or CLEC, we either do not quality or the cost of application, complication of program, or continued reporting and compliance have turned us away to focusing on our customers for revenue. Investing OUR money verses OPM (other people's money). I can easily say that is the story with most WISP's in today's industry.

Additional, affordable spectrum encourages us to continue investing in our company. In the last two years that has been more than 1 million dollars a year into new technology specifically LTE in the 3.65 spectrum. The importance to us as a company and investor is huge. BUT to our customer it is even bigger. They need companies like ours supporting them. Have you ever tried to get "technical support" from your cell carrier or local phone company? They are not all bad, but my experiences and our customer experiences in our area are NOT good at all.

Investment by industry. With additional spectrum (CBRS) it will spur additional investment and additional companies to invest in developing and providing different types of tools (new efficiencies of using the spectrum). It has taken 20 years +, in open spectrum to attract the investments that are currently in our industry and specifically, fixed wireless. By selling or giving spectrum to expensive auction of even expensive PAL pricing, only big companies can afford that. In my experience this greatly reduces innovation. They will "take what the market will bear" (proven by past experiences), before offering more for less.

Service Offerings. We look forward to offering services of 100/10 to our customers on a "regular" service package. We look forward to investing in our network to provide Fixed Wireless- Gigabit like services with new technology. It is possible today but not economical. By providing additional and affordable spectrum like the 3700-4200GHz spectrum, we can bond channels and use proprietary algorithms to achieve this.

Summary: As I am not a political person or a regular on commenting for items like this. I hope you will seriously consider the items I have discussed, supporting the Petition for rulemaking – RM-11791.

I am certainly open to contact if additional support is needed. I even open myself, by phone, in person or customer testimonies, to the commission if it is desired.

Sincerely & Respectfully,

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