

FORETHOUGHT.NET COMMENT RE FCC PROCEEDING 12-354 OPPOSING CTIA & T-MOBILE PETITIONS TO AMEND THE RULES FOR CBRS BAND

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Since 1995, Forethought.net and Brainstorm Internet has been a leader in introducing and operating Next Generation Networks – from Ethernet Over Bonded Copper, gigabit internet to small and large communities and the first deployments of WiMax conversion to LTE fixed wireless for over 15000 unserved or underserved customer in Colorado and New Mexico, including tribal areas, oil and gas enterprises, and rural health care.

The requested rule changes would completely alter the CBRS intentions following the Report & Order in April 2015, notwithstanding the three previous years' efforts starting with the NPRM in December 2012. Forethought.net opposes these rule changes totally as ingenious interests.

Since 2015, Forethought.net has engaged with numerous Colorado county and municipal governments to bring wireless broadband at or above FCC broadband standards of at least 25Mbps download to their rural areas. Having experience with LTE deployed under our 3.65 License (cancelled by this amendment) and have demonstrated the superior coverage in mountain areas drainages curving and tree lined, we have invested in public private partnerships to provide open access deployments of CBRS ready deployments potentially serving at least 1000 small PAL areas of 50 – 100 locations, or 100,000 unserved in our service area. The broader CBRS 100MHz spectrum and certainty of access to PALs in small areas is essential to delivering service to these areas.

The intent of CBRS was to the benefit of both large and small location licensing. The proposed rule changes essentially extend the status quo, where large blocks of most useful spectrum, would in auction, be provided to only tier one LTE cellular carriers, who have demonstrated they will orphan coverage in service of small markets of 50 – 100 locations

A change in rules would significantly affect our ability, like other wireless service providers in Colorado and nationwide, with plans based on current FCC rules for CBRS to the detriment of serving unserved rural communities.

Regards,

A handwritten signature in blue ink that reads "Eric Hager".

Eric Hager
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