

July 23, 2018

***FILED VIA ECFS***

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12th Street, S.W., Room TW-B204  
Washington, D.C. 20554

**Re: Citizens Broadband Radio Service  
Ex Parte Notification  
GN Docket No. 17-258**

Dear Ms. Dortch:

We are 182 fixed wireless broadband providers. We serve hard-to-reach places that no one else will: remote farms, schools, libraries, healthcare institutions, and other businesses that but for us would have no broadband or no broadband competition. But we are running out of the critical infrastructure we need to serve rural America: spectrum.

For decades, we have served rural families and businesses using unlicensed spectrum. But that spectrum is becoming more crowded with each passing day. We have potential customers within range of our towers that we cannot serve because we do not have access to adequate spectrum to do so.

But the FCC can help. Continued access to Citizens Broadband Radio Service (“CBRS”) spectrum is vital to our ability to continue serving rural America. And we write to urge the FCC to ensure that census tracts remain available as bidding units for Priority Access Licenses (“PALs”) in the CBRS band. We ask you to reject options that take census tracts off the table and propel rural broadband access backwards instead of forwards. Without census-tract-sized licenses, we will have virtually no ability to acquire protected spectrum in this band. That would be an intolerable outcome that would harm our rural broadband businesses and inhibit our ability to grow, but worse it would harm the millions of consumers for whom mid-band spectrum is the key to high-speed fixed broadband access.

Over the last year, many of us have spoken and written to the FCC to explain why census tract licenses in the CBRS band are critical to rural economic development and our ability to provide broadband to more rural consumers. We’ve provided maps showing that auctioning larger areas will effectively shut us out of the auction. We’ve explained that we’ve already invested in the CBRS band under the current rules by deploying software-defined radios in the 3650-3700 MHz band that can be easily upgraded to operate in the entire 3550-3700 MHz band, reaching more rural consumers within months. And we’ve explained how we’ve curtailed our investments based on the threat that we may not be able to bid for census tract PALs. While our businesses and networks are diverse and independent, we are united that census tracts are the only way that we can participate in the CBRS band auction.

We recognize the national priority of promoting 5G wireless technology. But 5G is not for mobile wireless only. We, too, want to deploy 5G to connect more devices and support precision

July 23, 2018

Page 2

agriculture and other industrial and enterprise solutions. “Winning the race to 5G” does *not* mean we need to let the most powerful companies in the mobile wireless industry define the rules of the road.

Our economy depends on small businesses like ours, and we are poised to invest – if the FCC gets the rules right.

We reluctantly acknowledge that the rules are likely to be changed, that we will no longer have access to seven census tract PALs. But there is no reason why, out of those seven PALs, that the FCC cannot retain at least two census tract PALs in rural areas to facilitate broadband deployment in the areas where we live and work. We urge the FCC, in the strongest possible terms, to preserve our ability, and the ability of other stakeholders, to bid on census tract PALs in rural areas.

Respectfully submitted,

Galen Manners  
President  
Wave Wireless, LLC  
Parsons, KS

Keefe John  
President & CEO  
Ethoplex  
Milwaukee, WI

Chuck Hogg  
President  
Shelby Broadband  
Simpsonville, KY

Mark Radabaugh  
President  
Amplex  
Luckey, OH

Jeff Kohler  
Co-Founder  
Rise Broadband  
Englewood, CO

Scott LePere  
President  
On-Ramp Indiana  
Noblesville, IN

Jeff Crews  
Vice-President  
Eastern Oregon Net, Inc.  
La Grande, OR

W. G. Capshaw  
Manager  
Capshaw Enterprises LLC  
dba Crossroads Wifi  
Middleton, TN

Jarel “JP” Pittman  
President, Founder  
Rodeo Networks/Rodeo Internet  
Clarkston, WA

Carl G. (Greg) Huber  
Manager  
CellTex Networks, LLC  
San Antonio, TX

Jeremy Sheets  
President  
CMS Internet LLC  
Mount Pleasant, MI

Seth Johannesen  
Partner and Network Manager  
101Netlink  
Whitethorn, CA

Lori C. Collins  
President  
SonicNet, Inc.  
Eagle River, WI

Ronald van Geijn  
President  
Eastern Shore Communications  
Cape Charles, VA

Jorge Santiago  
Chief Technology Officer  
BridgeNet Wireless  
Ocala, FL

Patrick Shoemaker  
Partner  
Vector Data Systems, LLC  
Crofton, MD

Drew Vermette  
Vice President  
Tower Net Communications, Inc.  
Spring Hill, FL

Randy Cosby  
Vice President  
InfoWest, Inc.  
St. George, UT

July 23, 2018

Page 3

Robert Clark  
President/ Owner  
Bolt Internet  
Prescott, AZ

Jay Domingue  
Business Development  
REACH4 Communications  
Crowley, LA

Joshua A. Beug  
General Manger  
Tularosa Communications  
Tularosa, NM

Jason Pond  
CEO & Managing Member  
Grizzly Broadband, LLC  
Hamilton, MT

Jeff Randolph  
Owner  
Advanced Internet  
Yakima, WA

Graham McIntire  
President & Owner  
Verona Networks LLC  
Princeton, TX

Jeff Hardesty  
Member  
Desert iNET, LLC  
Phoenix, AZ

Orion Lukasik  
President & CEO  
AlignTec Incorporated  
Durango, CO

Kurt Albershardt  
Managing Member  
Mimbres Communications, LLC  
Silver City, NM

Jeremy Smith  
Owner/Manager  
Blue Spring Broadband  
Providence, UT

Drew Beverage  
VP Business Development  
ProValue.Net  
Stillwater, OK

Tony Holland  
President  
Isotech Inc./KCCoyote Inc.  
Trimble, MO

Joe Royer  
President & GM  
Royell Communications Inc.  
Virden, IL

William Fowler  
President/CEO  
Verso Networks  
Denver, CO

Ken Garnett  
Chief Technology Officer  
Cal.Net, Inc.  
Shingle Springs, CA

Todd Tanner  
Executive Vice President  
SkyPacket Networks  
Cumberland, MD; Scranton, PA

Atilla Gahbro  
Founder & CEO  
Subrigo International  
Los Angeles, CA

Ryan Amburgy  
Network Engineer  
Impulse Advanced Communications  
Santa Barbara, CA

Scott Gibbs  
CEO  
VGI Technology, Inc.  
San Angelo, TX

Alex Phillips  
President & CEO  
HighSpeedLink.net  
Harrisonburg, VA

Sean Heskett  
Owner & CTO  
ZIRKEL Wireless  
Steamboat Springs, CO

Jeff Leerhoff, Owner/Manager  
Bits Technology Wireless Internet  
LLC dba BTWI Wireless Internet  
Perry, IA

Gregory B. Armstrong  
CEO  
Surf Air Wireless  
La Porte, IN; Elkhart, IN;  
Coal City, IL

Tristan Johnson  
Owner/Member  
Wireless Data Net, LLC  
Saybrook, IL

Adair Winter  
Owner & VP of Network  
Operations  
Amarillo Wireless & AW  
Broadband  
Amarillo, TX

Kristian Hoffmann  
President  
Interwest Management Services  
Inc. dba Fire2Wire  
Salida, CA

Britain Turner  
President  
AirFi, Inc.  
Zebulon, GA

July 23, 2018

Page 4

Catherine A Hartenbower  
H. I. Cable, LLC  
Lostant, IL

Steve Barnes  
Wireless Ops Manager  
NLBC  
New Lisbon, IN

Patrick Parks  
President  
SmartBurst LLC  
Aubrey, TX

Malynda Nowell  
President & Co-Owner  
Ridgewood Holdings LLC  
dba Net 3 ISP  
Midland, Texas

Daniel Peoples  
Owner  
Resonance Broadband LLC.  
Haileyville, OK

Tim Reichhart  
Owner  
Northwest Ohio Broadband  
Coldwater, OH

Greg Hayman  
Managing Member  
Tecinfo Communications  
Leland/Jackson, MS

Steven L. Mason  
General Manager  
Lighthouse.Net  
Sault Ste. Marie, MI

David Cleveland  
Managing Partner  
DMCI Broadband, LLC.  
Hillsdale, MI

Harvern Davis  
Network Manager  
Crossroads WiFi  
Middleton, TN

Warren Kane  
CEO  
B2X Online, Inc.  
Salem, VA

Troy Rasmussen  
CEO  
Back 4 Wireless  
Jackson, MN

Alan Fitzpatrick  
CEO  
Open Broadband, LLC  
Waxhaw, NC

Stephen Lash  
President & CEO  
Signal Net Broadband, Inc.  
Wylie, TX

Zot Barazzotto  
President  
Clifton Communications, LLC  
Clifton, OH

Phillip Randash  
CEO/Owner  
Northern Skies Wireless LLC  
Bismarck, ND

Kevin Robinson  
President  
Aroostook Technologies Inc.  
Presque Isle, ME

Josh Luthman  
President  
Imagine Networks  
Troy, OH

Matthew Thomas  
Founding Member  
WON Communications LLC  
Springfield, MO

Jerry Stephens  
CEO  
SOS Communications LLC  
Georgetown, TX

Chris Felix  
IT Manager  
Coffeyville Connection/City of  
Coffeyville  
Coffeyville, KS

Mike Scott  
President & CEO  
STT Rural Net  
Emmetsburg, IA

Neal Silvers  
WISP Owner  
Backroads Broadband

Tim Cailloux  
President & CEO  
Southern Internet, Inc.  
Fairburn, GA

Anthony Will  
VP  
Broadband Corp.  
Victoria, MN

David Busch  
CEO  
ZipLink Systems LLC  
Queen Creek, AZ

Emiel Butcher  
President  
Micrologic Inc.  
Buckhannon WV

July 23, 2018

Page 5

Nick Bright  
Vice President of Technology  
Valnet Holdings, LLC  
Independence, KS

Eric Williams  
Owner  
SDWisp  
Spring Valley, CA

Mike Whelan  
CEO  
AirLink Internet Services  
Mounds, OK

Brian Gray  
Wireless Network Manager  
Joink, LLC  
Terre Haute, IN

Wes Davis  
Owner  
Canyon Wireless  
Spring Valley, CA

Virginia Lam Abrams, SVP,  
Communications & Government  
Relations  
Starry, Inc.  
Boston, MA

Nathan Stooke  
CEO  
Wisper ISP, Inc.  
Mascoutah, IL

Matt Hoppes  
President & CEO  
River Valley Internet  
Williamsport, PA

Ryan Wilkins  
Managing Member  
Elevated Networks LLC  
Oberlin, OH

Chris Soiles  
Owner  
Rio Cities Internet  
Belen, NM

Paul Conlin  
President  
Blaze Broadband  
Marshall, VA

Joseph Falaschi  
General Manager  
e-vergent.com, LLC  
Racine, WI

Daniel Rudnick  
President  
Advanced Wireless  
Santa Maria, CA

Conor Ferguson  
President & CEO  
WISPr Systems  
Batesville, MS

Michael Clemons  
President  
GigaBeam Networks, LLC  
Rich Creek, VA

Roland Houin  
President  
Fourway Computer Products,  
Inc.  
South Bend, IN

Spencer Pous  
CEO  
SJP Network Solutions, LLC  
Ft. Walton Beach, FL

Jacques L. Fluker  
Chief Technology Officer  
Pixius Communications, LLC  
Wichita, KS

Colin Wood  
CEO  
TransWorld Network, Corp.  
Oldsmar, FL

Alan Luef  
General Manager  
Alsat Wireless  
Montgomery City, MO

Joseph J. McGrath II  
Owner & President  
Texoma Communications, LLC  
Sherman, TX

Jason Dabbert  
Owner  
Leap Communications, LLC  
Parker, SD

Roxanne White  
CEO  
Evertek, Inc.  
Everly, IA

Phillip D. Maag  
President & CEO  
MetaLINK Technologies, Inc.  
Defiance, OH

Shane Baggs  
President/GM  
BEH Communications, LLC  
Price, UT

Eden Recor  
Owner & CEO  
Grand County Internet Services  
Inc.  
Grand Lake, CO

Kent Winrich  
Chief Technology Officer  
Open Broadband LLC  
Salisbury, NC

July 23, 2018

Page 6

Al Rachide  
Managing Partner  
Eastern Carolina Broadband  
LLC  
Pink Hill, NC

Royce Henningson  
President & CEO  
River Canyon Wireless  
Moab, UT

Forbes Mercy  
President  
Washington Broadband, Inc.  
Yakima, WA

Alexander M. Mann  
Installation Technician  
Win Win Wireless  
Houghton, NY

Shane T. Miller  
Partner  
Celerity Networks LLC  
Spearfish, SD

Jeff Rhue  
Chief Technical Officer  
WiLogic, Inc.  
Huntington Beach, CA

Cody Landrum  
President & CEO  
Southern Broadband  
(3rd Coast Internet)  
Crystal Beach, TX

Paul McCall  
President  
Florida Broadband, Inc.  
Vero Beach, FL

Joe Gaylord  
Owner  
COLI  
Rapid City, MI

Kevin Voss  
President & CEO  
Door County Broadband  
Door County, WI

Troy Gibson  
Owner  
Byhalia.net, LLC  
Bellefontaine, OH

Garrett Kellner  
CTIconnect, LLC  
Round Rock, TX

Charles Thomas  
Chief Operations Officer  
Omnipoint Technology, Inc.  
Springfield, MA

Ryan Walker  
President & CEO  
OACYS Technology  
Porterville, CA

Eric Rogers  
President  
Precision Data Solutions, LLC  
Mooresville, IN

Garth Nicholas  
CFO  
New Wave Net Corp.  
Bloomington, IL

Aaron Palmer  
President  
LR Communications  
Leaf River, IL

Kathy Tate  
CEO  
McMinnville Access Company  
McMinnville, OR

Chris Jeske  
President  
West Orange Wireless Inc.  
Winter Gardens, FL

Ryan Grewell  
President  
Smart Way Communications LLC  
Uhrichsville, OH

Brandon Sloan  
CEO  
Sloan Holdings, LLC  
Westernport, MD

Scott Pope  
Network and Operations Officer  
Arbuckle Communications LLC  
Ardmore, OK

Paul Stebbins  
Owner  
Winfinity LLC  
Liberal, MO

Ryan Ellsworth  
President  
Vegas WiFi Communications,  
LLC  
Las Vegas, NV

Kris McElroy  
SVP of Operations and Partner  
360 Communications, Inc.  
Durant, OK

Travis Allen  
President  
Total Highspeed LLC  
Springfield, MO

Stuart Robertson  
Owner  
Veopoint Internet  
Longview, TX

July 23, 2018

Page 7

Robert Haas  
Network Administrator  
BPS Network/BPS Telephone  
Company  
Bernie, MO

Paul Scortea  
CEO  
AirFiber WISP LLC  
Phoenix, AZ

Jon Truell  
President & CEO  
Future Wireless Technologies of  
Nebraska  
Lincoln, NE

Aaron Clark, Vice President Chief  
Operating Officer  
Future Wireless Technologies  
of Nebraska  
Lincoln, NE

Bradley Hagstrom  
Owner  
Jenco Wireless, LLC  
Marysville, OH

Jay Fuller  
President/CEO  
Cyber Broadband Inc.  
Cullman, AL

Jimmy Carr  
President & CEO  
All Points Broadband  
Ashburn, VA; Roanoke, VA

Jason Telles  
Owner  
Gigabeam Internet  
Yakima, WA

David Waldrop  
Owner  
Twin State Wireless, LLC  
Demopolis, AL

David Snyder  
President  
VOLstate, Inc. DBA RevTel.net  
Dayton, TN

Michael Meluskey  
CTO and Founder  
Broadband VI  
St. Croix, VI

Anthony Pierro  
Chief Technology Office  
Wireless Internet Services, Inc.  
Visalia, CA

C. D. Tavares  
Owner  
Grand Avenue Broadband  
Wickenburg, AZ

Adam Bates  
Operations Manager  
FreedomNet Solutions  
Byron Center, MI

Reilly Flaherty  
President  
Hexis Internet  
Jackson, WI

Jorge Santiago  
Chief Technology Officer  
BridgeNet Communications  
Ocala, FL

Michael Underdown  
MitoTec, LLC  
Burr Ridge, IL

Cody Landrum  
President/CEO  
3<sup>rd</sup> Coast Internet  
Crystal Beach, TX

Troy A. Slagle  
Information Technology Manager  
Mid-States Services, LLC  
Trenton, MO

Mathew Ford  
CEO  
Ayer Technologies, Inc.  
Modesto, CA

Matt Lauer  
CEO  
Solvaris Net LLC  
Romeo, MI

Joel White  
President  
NexGenAccess Inc  
Delaware, OH

Paul F. Barton  
President and GM  
Westelcom Network Inc.  
Watertown, NY

Sonja Harris  
Director of Company Development  
Conifer Communications, Inc.  
Sonora, CA

David Rodecker  
Managing Partner  
Wisp.net  
Fountain Valley, CA

Craig Mason  
Owner  
Vertical Broadband LLC.  
Delta Junction, AK

Zachery D. Peres  
Vice President  
JMZ Corporation d/b/a KwiKom  
Communications  
Iola, KS

July 23, 2018

Page 8

Gilbert A. Darrell  
Horizon Communications  
New York, NY

Greg Coffey  
AllureTech/CoffeyNet  
Casper, WY

Mike Hammett  
President  
Intelligent Computing Solutions  
DeKalb, IL

Travis Mikalson  
CEO  
TerraNovaNet, Inc.  
Key Largo, FL

Kevin Owen  
President & CEO/Owner  
First Step Internet, LLC  
Moscow, ID

Kevin M. Triplett  
President & CEO  
Softcom Internet Communications,  
Inc.  
Galt, CA

Ben Mize  
Operations Director  
Tecinfo Communications, LLC  
Leland, MS

Tim Shaw  
President  
Hill Country Broadband Inc  
San Antonio, TX

Kevin Brown  
CEO  
Quantum Telecommunications, Inc.  
Manchester, MD

Andrew Wicker  
Director of Infrastructure  
Vistabeam  
Gering, NE

Kevin Melson  
President  
Eagle One Wireless\PC Station  
Corinth, MS

Marlon Schafer  
Odessa Office Equipment  
Odessa, WA

Glenn Kelley  
President, CEO  
Connectivity.Engineer LLC  
Racine, OH

Jim Hanley  
President, CEO  
netBlazr Inc  
Boston, MA

Travis Boyd  
Owner  
Wallowa Valley Networks  
Enterprise, OR

Brian Fults  
Owner  
FulAir LLC  
Lake Charles, LA

Pat Wilson  
President  
The Computer Works  
Conway, AR

Michael Lingwall  
Operations  
Prestige Broadband, LLC  
Springville, UT

Aaron Larson  
President and CEO  
SPITwSPOTS Inc.  
Homer, AK

Joel Brick  
Owner  
Interlakes Wireless  
Madison, SD

Douglas Ratcliffe  
Owner  
Direct Wireless Web  
Daytona Beach, FL

Darin Steffl  
President & CEO  
Minnesota WiFi  
Kasson, MN

John Dunbar  
Assistant General Manager  
MHTC  
Mt. Horeb, WI

Ben Blomgren  
Owner  
JTN Communications, LLC  
Farmington, MN

Michael Birnbaum  
Managing Member  
Cloud Alliance LLC  
Plainfield, VT

Fred Moses  
Chief Technology Officer  
Tri-County Wireless, Inc.  
Fenton, MI

Brian Madl  
President  
Edge Broadband  
Whitewater, WI



July 23, 2018  
Page 9

Izzy Bocanegra  
CEO  
Emerald Harbor  
Communications  
LLP  
Destin, FL

AJ Becker  
President  
Sonic Spectrum Inc.  
Durand, IL