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| In the Matter of  Petition for Rulemaking to Maximize Deployment of 5G Technologies in the Citizens Broadband Radio Service  Amendment of the Commission’s Rules with Regard to Commercial Operations in the 3550-3650 MHz Band | )  )  ) RM-  )  )  )  ) GN Docket 12-354  )  ) |

Before the

FEDERAL COMMUNICATIONS COMMISSION

Washington, DC 20554

**Comments in Support of Petition for Rulemaking**

Boingo Wireless, Inc. (“Boingo”) hereby files these Comments in support of the Petition for Rulemaking (“Petition”) filed by T-Mobile USA, Inc. (“T-Mobile”) in the above-captioned proceeding.

Boingo shares many of T-Mobile’s concerns expressed in its letter and specifically supports Sections IV and VII of the Petition. With regard to Section IV, Boingo agrees with T-Mobile’s argument that deploying a network takes several years, and that a less than 10-year license term is not sufficient to ensure that licensees will be able to recover a return on investment and that lack of a renewal expectation decreases the incentive to invest in infrastructure. Similarly, neutral host operators such as Boingo will be negatively affected because carriers will be less willing to invest in networks with shorter than ten-year license terms.

With regard to Section VII, Boingo agrees with T-Mobile’s argument that PALs should be authorized using areas larger than census tracts. A licensing mechanism authorizing PALs based on a greater than census tract basis would administratively facilitate and encourage carriers to provide service on a larger geographic scale, enabling greater efficiencies in deployment and provision of service. This will give sufficient licensing flexibility and promote the participation by a broader array of carriers.

Finally, technical rules that accommodate wider bandwidths are necessary to meet the requirements of true 5G services. Rules that require a licensee to reduce power to support wider bandwidths will impede the deployment and provision of services and limit the potential of this band to meet the needs of consumers.

Boingo appreciates the Commission’s efforts to address these issues.

Respectfully submitted,

BOINGO WIRELESS, INC.

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