

1225 Sage Street

Gering, NE 69341

(308) 635-9434 phone $ (888) 251-0920 toll free

(308) 635-9435 fax

www.vistabeam.com

July 23, 2017

I would like to voice my strong disapproval of the CTIA and T-Mobile petitions that have been submitted regarding possible rule changes to the CBRS bands.

Vistabeam is a fixed Wireless Internet Service Provider serving over 4000 customers in Northeast Colorado, Western Nebraska and Eastern Wyoming. Our service area is over 40,000 square miles and includes some of the most rural areas in the United States. In many parts of our service area, we are the only provider of fixed broadband service and in the areas that have service from multiple providers, we deliver much needed competition. Our speeds range from 2Mbps to 1Gbps, depending on the density of the population, available backhaul capacity, availability of clean spectrum and tree cover in the vicinity of the customer.

Up until recently, all of our services have been deployed using Part-15 unlicensed spectrum in the 900mhz, 2.4ghz and 5ghz bands. While we have managed to accomplish a lot with this limited, shared spectrum, it has severely limited the potential coverage and market penetration that we can accomplish. CBRS spectrum under the currently proposed rules will address two of the major shortcomings that are preventing us from serving more customers with higher speed services: availability of clean spectrum and tree cover.

Opening up the CBRS spectrum for PAL and GAA access is critical if WISPs are to meet the demand of our existing customers and the potential customers that are within our coverage areas. In many of our more densely populated areas, all of the Part-15 bands are full of overlapping users that are all fighting for slivers of relatively clean spectrum. While we can mitigate this with good RF design and rapidly evolving equipment, it is getting harder to add capacity fast enough to meet demand. Access to CBRS spectrum in relatively small geographic blocks will be badly needed to meet that demand.

With regard to tree cover, preliminary tests with LTE equipment in 3.65ghz spectrum just above the proposed 3.5ghz CBRS spectrum show that we can deliver 25Mbps speeds through dense tree cover to nearly 100 percent of the potential customers within the service range of an access point. Under certain conditions and configurations, we may be able to double the speeds delivered. This would be a godsend to many of our service areas, where high latency satellite and obsolete DSL connections are the only other services available.

Selling CBRS spectrum in larger blocks at auction to the highest bidder will in effect prevent smaller, innovative companies like mine from continuing our mission of delivering world-class wireless broadband to rural areas of the United States. Our goal is to provide the best possible service to our customers using the tools that we have available. CBRS spectrum is a valuable tool that will allow us to do the job that the other broadband companies have not been able to do. I hope that you will keep this in mind as you put together the NPRM.

Thank you for your consideration!

Matt Larsen, CEO