



Via ECFS  
Marlene H. Dortch, Secretary  
Federal Communications Commission  
RE: GN Docket No. 12-354, RM-11778 and RM-11789  
445 12th Street, S.W.  
Washington, D.C. 20554

Dear Ms. Dortch:

My company, Shelby Broadband, a Small Business with 20 employees that provides Fixed Wireless broadband service in Kentucky. We rely primarily on unlicensed spectrum to deliver broadband services to consumers that have no broadband choices. We built our network from scratch using devices authorized under Part 15 rules the FCC adopted to open up 900 MHz, 2.4 GHz, 3.65 GHz and 5 GHz spectrum for unlicensed or light licensed broadband devices. We have deployed many devices in the 3.65GHz band and have made substantial investments to continue to deploy in this band. This band is important to the future of our business and the additional CBRS spectrum will allow us to provide even faster speeds to our customers. We have spent over \$100,000 in equipment and plan to spend another \$250,000 once the CBRS band has been fully approved.

I am a member of WISPA and have spent a large amount of time, effort, and money into negotiating fair access to the CBRS band. The concept that the FCC will change the overall structure of this band due to submissions by the mobile carriers and their organization is very disturbing to all of the individuals involved. This spectrum was widely ignored by them, and only now that we are nearing the finish line do they want to completely change the rules. They want to make it more expensive and too costly for Small Businesses to be able to operate equipment in this spectrum. Additionally, they want to remove GAA access and change the band enabling only the major carriers to use it. We all know that Rural America is already forgotten by the major carriers. This is just another way to prevent Small Business from providing cost effective services to Rural America.

Our customers demand more bandwidth. Every year the capacity requirements increase 2-3 times the previous year. Being able to have access to this spectrum will allow us to meet the demands of our customers. These are the same customers that have no other choice but our fixed wireless. Providing choice to Rural America is important, and changing the rules so that only a few can play would be detrimental to Internet Accessibility.

Our company supports the positions taken by WISPA, the Wireless Internet Service Providers Association, and opposes the filings made by both the CTIA and T-Mobile.

Sincerely,

Charles T. Hogg Jr.  
President/CEO  
Shelby Broadband