July 22, 2017

Marlene H. Dortch, Secretary

Federal Communications Commission

RE: GN Docket No. 12-354, RM-11778 and RM-11789

I am writing this on behalf of OnlineNW an internet service provider located in Oregon. This is regarding the proposed changes to the CBRS Band proposed by CTIA and T-Mobile.

In addition to providing DSL and Fiber services a large portion of our business is providing wireless internet service to rural internet users in the Willamette valley. Our wireless coverage is primarily rural where we are the best and sometimes only choice for internet access. We have rural services wireless services providing speeds between 3 mbps and 11 mbps. We have over 2500 customers with wireless service on a variety of unlicensed frequencies including 900 MHz, 2.4 GHz, 5 GHz, and 3.65 GHz.

We have used 3.65 GHz equipment to provide services to hundreds of our customers across our coverage area. Additional frequency is critical for our further growth and our ability to provide faster speeds to our existing customers. This frequency has been especially useful as the low noise floor and allowed power levels allow us to provide high speed service over moderate ranges. Given our geography this is an especially effective frequency for providing service to a large number of rural locations.

We are not in favor of the proposed changes to the CBRS band. The current CBRS design will allow us to expand our service in a cost effective manner. Given the opportunity to purchase licenses for rural areas will allow us to make use of this spectrum. This will allow us to provide more speed to existing customers in addition to reaching new customers in our service area. The suggested changes would make it more difficult for us to acquire and use the additional 3.5 GHz spectrum. New frequency availability is very rare opportunity for smaller businesses such as ours and the propose changes would limit our opportunity to participate in this benefit. As such we are very much against the proposed changes.

Thank you for your consideration.

Kathy Tate, CEO