



July 24, 2017

Via ECFS (GN Docket No. 12-354)  
Marlene H. Dortch, Secretary  
Federal Communications Commission  
Office of the Secretary  
445 Twelfth Street, S.W.  
Washington, D.C. 20554

**Re: CTIA and T-Mobile Petitions for Rulemaking Regarding the Citizens Broadband Radio Service**

SPITwSPOTS, Inc. ("SPITwSPOTS") submits these comments regarding the Petitions for Rulemaking filed by CTIA and T-Mobile to request changes to the Federal Communication Commission's ("FCC") rules governing the Citizens Broadband Radio Service (CBRS). SPITwSPOTS urges the FCC to reject the petitioners' efforts, at this late date, to rewrite the rules and thereby strand significant investments that many stakeholders already have made in the band.

SPITwSPOTS is an Alaska-based fixed wireless broadband service provider. Our company has deployed infrastructure using the 900 MHz, 2.4 GHz, 3.65 GHz and 5.470-5.825 GHz bands to provide valuable broadband services to approximately 1,500 consumers within the Kenai Peninsula Borough. Many customers live in extremely rural, remote areas of the state. We offer residential broadband plans with speeds of up to 100 mbps.

With respect to CBRS and 3.5-3.7 GHz spectrum, we devoted significant capex spending to 3.65 GHz services. The flexibility afforded under the FCC's "light licensing" have provided benefits given the extremely high cost of deploying broadband services in Alaska. In addition, once the FCC opened an additional 100 MHz in the 3.5 GHz band to new CBRS services under an innovative licensing approach, we took great interest in opportunities to make additional use of these bands. The combination of relatively short license terms, innovative frequency coordination and highly local license areas (census tracts) could afford great opportunities for small providers and new competition in these bands.

Petitioners ask the FCC to undo this significant multi-year progress and instead tip the scales to favor large incumbent wireless carriers who seek to make use of this band. We oppose these efforts.

T-Mobile and CTIA ask the FCC to auction priority access licenses based on Partial Economic Areas ("PEAs"), which are much larger than the census tracts for PALs authorized under current rules. Such a change would make it significantly harder for small companies like ours to compete to acquire spectrum that is greatly needed for broadband deployments in sparsely populated areas. Census tracts are much more narrowly tailored than PEAs, and the use of census tracts could allow us to develop particularly local deployments in tailored service areas. A local company the size of SPITwSPOTS simply cannot compete effectively against large carriers in acquiring spectrum if SPITwSPOTS is forced to bid on large geographic areas against spectrum aggregators.

Similarly, T-Mobile and CTIA ask that the FCC take what was to be an innovative licensing model and to make the CBRS a clone of other spectrum that already exists for LTE deployments nationwide. These mobile interests propose adopting longer license terms and a renewal expectancy, but such a move would foreclose opportunities for small companies like ours to make quick and nimble broadband deployments to customers in areas that are difficult to serve with broadband. Moreover, too many stakeholders have invested too much time and too many resources to support the existing rules, and such a wholesale shift proposed by CTIA and T-Mobile would strand the significant investments that many have made in reliance on the rules established by the FCC a few short years ago. Such delays will harm rural broadband customers, particularly in the remote areas of Alaska that we serve and serve well.

For these reasons, SPITwSPOTS respectfully requests that the FCC dismiss the Petitions for Rule Making filed by T-Mobile and CTIA related to the Citizens Band Radio Service.

Respectfully submitted,

**SPITwSPOTS, LLC**

By: 

Title: **President**