



**To: Federal Communications Commission  
Washington, DC 20554**

**From: ATC Communications  
524 Nebraska Ave  
Arapahoe, NE 68922**

**Comments (Docket No. 12-354)**

ATC Communications and ATCJET.NET is a family owned and operated business firmly rooted in Southwest Nebraska. For nearly 115 years, ATC Communications has embraced the challenges of providing telecommunications and broadband services to our customers. Despite these challenges, ATC Communications has committed millions of dollars to provide our customers high speed internet connections in this very rural part of Nebraska.

ATC Communications offers high speed internet services to more than 40 communities in Southwestern Nebraska with population centers as small as 39 people. With a customer base approaching 3000, ATC has been able to strategically utilize a variety of technologies in serving our customers. We currently provide broadband services over DSL, Fiber, Cable and Fixed Wireless. The majority of our service area infrastructure has advanced into a hybrid-fiber to wireless methodology in conjunction with partnerships between ATC and local farmer Cooperatives. Investing in this strategy has allowed us to grow our network by plowing fiber to the Cooperatives and placing point-to-multipoint on top of their grain elevator structures. The benefit of this approach is the ability to efficiently serve the most rural parts of SW Nebraska to Americans that lack broadband services or a choice of providers.

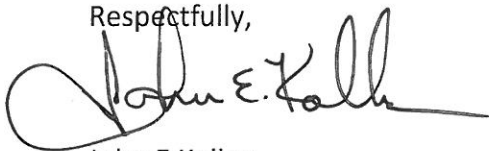
As of today, ATC Communications has made significant investments in fixed wireless technology to provide economical broadband connections with approximately 60% of our broadband customers seeing their last-mile connectivity through fixed wireless.

Early installments of our fixed wireless network utilized un-licensed frequencies. As more private entities began to leverage this technology for enterprise connectivity and other uses, we saw serious degradation of our infrastructure. By utilizing the 3650-3700 MHz band and the benefits of a lightly licensed spectrum, we have been able to reach some of the most rural un-served and underserved households in this part of the state with high-quality voice and data services. ATC continues to make every effort to serve even the most rural and sparsely populated areas.

ATC also serves in larger communities where competition for spectrum is quite aggressive. In these population centers, even the existing 3.65 GHz band is currently suffering, limiting our ability to offer quality services that our customers have come to expect. ATC is pleased to learn about the rule-making proposed in Citizens Broadband Radio Service. The possibility of gaining access to an additional 100 MHz of mid-band spectrum would be unquestionably helpful to the continued success of our investment and commitment to providing affordable internet access. In rural areas, the proposed allotment of General Access frequency will not only allow our company to provide quality services, but help to justify the significant investment. In larger markets, ATC embraces the possibility of a truly licensed infrastructure through the Priority Access License process and urge the Commission to protect this new band as an opportunity for small business operators to grow. This additional spectrum will increase throughput, decrease interference, and improve quality of service.

If the FCC allows the rules to be changed to adopt the ideas presented in the CTIA and T-Mobile petitions, the impact to local rural providers and private entrepreneurs would be devastating. Companies our size could see a sizable investment in the current 3.65 equipment become irrelevant. The rules would prohibit participation in the CBRS bidding process and seriously deter future investment in wireless infrastructure.

Respectfully,

A handwritten signature in black ink, appearing to read "John E. Koller". The signature is fluid and cursive, with a large loop at the beginning and a long, sweeping underline.

John E Koller

VP/GM, ATC Communications