



July 22, 2017

RE: Federal Communications Commission Proceeding 12-254

Dear Commissioners:

I am writing on behalf of KGT, LLC. DBA Western Wimax regarding the petitions filed by CTIA and T-Mobile requesting changes to the CBRS band. Western Wimax has been providing broadband Internet service in and around the Phoenix Metro area since 2002 and has been utilizing the 3650-3700 MHz band since 2006. Western Wimax has two areas of focus. One part of our business is providing high speed Internet service to residences in underserved areas around Phoenix. Many of these areas do have DSL service available, however, the maximum available speed is 5Mbps. We currently provide speeds up to 20 Mbps and have begun the process of upgrading our network to offer speeds up to 50 Mbps. We will not be able to provide these speeds to many of our customers with use of the current 3650-3700 band and upcoming CBRS band.

The other part of our business is providing high speed Internet and data services to businesses in the Phoenix Metro area. Contrary to popular belief, many businesses in metro areas lack access to cost effective broadband services. In addition to broadband Internet service, we offer services such as LAN extension to data centers, truly diverse path redundancy, and new services such as SD-WAN. Our size gives us the flexibility to provide the services our customers look for but can't get from larger telecommunications providers.

Our customers range from small, innovative startups to Fortune 100 corporations. We utilize the 3650-3700 MHz band to provide a lower cost option than we are able to with point to point technology. These lower cost services are very important to our small business and non-profit customers. Some of our small business customers provide critical support services to larger corporations and government entities. They require cost effective redundant connections that only we can provide. Our plan has been to use the CBRS band, when available to expand our business services in both geographic coverage and speeds offered.

We adamantly oppose the changes to the CBRS band proposed by CTIA and T-Mobile. Not only would the proposed changes wipe out our investment in 3650-3700 MHz equipment, it would also make certain that access to the CBRS band in urban and suburban areas would only be for a few large corporations. This seems to go completely against the original intent of the band, and the name 'Citizens'. I strongly urge the commission to deny the petitions of the CTIA and T-Mobile and keep the current CBRS spectrum plan.

Sincerely,

*Todd Bergstrom*

Todd Bergstrom, President

