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July 23, 2017

Ms. Marlene Dortch
Secretary
Federal Communications Commission
445 12th Street SE
Washington, DC 20554

RE: Amendment of the Commission's Rules with Regard to Commercial Operations in the 3550-3650 MHz Band, GN Docket No. 12-354; Petitions for Rulemaking, RM-11788, RM-11789

Public Comments of CMS Internet.LLC

Dear Ms. Dortch:

On behalf of my company, CMS Internet, I am writing to oppose petitions filed by CTIA and T-Mobile to amend the rulemaking process for the Citizens Broadband Radio Service. We strongly feel that the current rules outlined in Part 96 serve the best interests of our customers.

CMS Internet was founded in 1997 when we began offering dialup Internet services. In 2002 we deployed our first fixed wireless network, and since that time have expanded to include fiber, cable, and DSL as part of our Internet service offering(s).

The majority of our coverage territory is located in rural Mid-Michigan, where service offerings are limited in many cases to either fixed wireless, satellite, or cellular. CMS, as well as other Wireless Internet Service Providers (WISPs) in the area, provide consumers with an important alternative to national based cellular and satellite options. WISPs are often the only alternative that offer unlimited data to their end users. Furthermore, WISPs have invested in geographic areas that have been historically overlooked by national carriers due to unfavorable

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demographics. Our employees live in the communities we serve, and provide a level of support to our customers that is simply not practical for national carriers. We personally know the majority of our customers, and are dedicated to enriching their lives as we work to eliminate the digital divide one community at a time.

Looking forward, CMS views the CBRS band as essential for small businesses and communities nationwide. With usage demands increasing exponentially on an annual basis, new spectrum is sorely needed to keep pace. While the 900 MHz, 2.4 GHz, 3.65 GHz and 5 GHz bands have and continue to play a key part in our ability to serve our customers, new options will be necessary in the coming years.

The fixed wireless Internet industry in the United States is largely made up of thousands of local WISPs, whose core mission is to provide best possible service to its end users. We live and work with the people we serve. They're our friends, neighbors, and acquaintances. Serving these communities is more than just making money, it's an investment into our collective future.

We view the CBRS band as a critical tool moving forward. Allocating spectrum on a local level, in the hands of local operators who best know the needs of their communities, will revolutionize the way spectrum is shared and serve as a model for other parts of the world. We respectfully ask that the Commission reject the amended rules proposed by CTIA and T-Mobile, so that the underlying intent of the CBRS – closing the digital divide in rural America – is realized.

Thank you for your time and consideration.

Respectively submitted,

A handwritten signature in black ink, appearing to read "J. Sheets".

Jeremy Sheets, President
CMS Internet LLC

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