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| WISP PARTNERS, INC.  *Building rural broadband*  4698 Tally Ho Court  Boulder, Colorado 80301  [www.wisppartners.com](http://www.wisppartners.com) | C:\Users\Ted\AppData\Local\Microsoft\Windows\INetCacheContent.Word\Knight.png |

July 24, 2017

Before the

Federal Communications Commission

Washington, D.C. 20554

To: Chief, Wireless Telecommunications Bureau

Chief, Office of Engineering and Technology

RE: Citizens Broadband Radio Service GN Docket No. 12-354

WISP Partners is a firm dedicated to providing executive support to the builders of rural broadband services across the American West. We stand opposed to the petition for rulemaking filed by CTIA and T-Mobile asking the FCC to make fundamental changes to the Citizens Broadband Radio Service band. We find the assertions brought to the Commission expressing ideas of national propriety; global competitiveness, national security, and growth in GDP to be an assembly of excellent words however lacking demonstrative context to their petition. The original purpose of “use it or share it” correctly deploys resources vital to filling *todays* need for competitive broadband, not tomorrow’s set of Gs.

But for rural America, a compromise is at hand, to license PAL’s in rural Census Tracts at five-year terms with the expectation of licensee renewal under the SAS “use it or share it” standard of care.

Chairman Pai has remarked in his recent blog posts about having witnessed first-hand the need to close the digital divide. On behalf of WISP Partners, I too have traveled rural lands across twenty-two western states since January, 2017, driving many thousands of miles across rural state highways to work with local operators bringing broadband Internet services. We work with amazing people, great Americans serving, not virtually gaming; but actually using wireline and wireless technologies for last mile applications, whichever is the best construct to build broadband toward digital empowerment, today, not tomorrow.

CBRS promises to put spectrum to work to deliver rural broadband at performance standards greater than 50 Mbps, 100 Mbps, reaching toward multi-gigabit services. We believe this great innovation in wireless policy started by the FCC must go-forward, to innovate spectral efficiency and new radio designs. To fulfill the Chairman’s Digital Empowerment Agenda.

Sincerely,

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Ted B. Osborn