

**Before the
Federal Communications Commission
Washington, DC 20554**

In the Matter of)	
)	
RADWIN LTD.)	RM-11812
)	
Amendment of Part 15 of the Commission's)	
Rules to Advance Improved Broadband)	
Services in U-NII-1 and U-NII-3 Bands)	

COMMENTS OF CALIFORNIA INTERNET, L.P. DBA GEOLINKS

California Internet, L.P. DBA GeoLinks (“GeoLinks” or the “Company”) submits these comments in support of the Petition for Rulemaking (“Petition”) filed by RADWIN LTD. (“RADWIN”).¹

I. INTRODUCTION

GeoLinks is proud to service the largest coverage area of any single fixed wireless Internet service provider in the state the California. The Company’s fixed wireless technology platform depends on access to spectrum resources sufficient to support enterprise-level broadband connections.² For the reasons set forth herein, GeoLinks supports the rule changes proposed in the Petition and urges the Commission to open a Notice of Proposed Rulemaking on this matter.

II. DISCUSSION

In the Petition, RADWIN requests that “the FCC modify its rules to allow for the provision of improved broadband services in the U-NII-1 (5.15-5.25 GHz) and U-NII-3 (5.725

¹ See Public Notice, Report No. 3097 (rel. June 29, 2018).

² While GeoLinks supports expanded use of unlicensed spectrum frequencies such as those proposed in the Petition, GeoLinks does not believe that unlicensed spectrum is a one-size-fits-all solution. GeoLinks urges the Commission to continue to evaluate licensed spectrum opportunities available to broadband providers of all technologies, including fixed wireless, in order to ensure competition in the broadband market to meet the differing needs of differently situated communities (i.e. rural vs. urban).

and 5.85 GHz) Unlicensed National Information Infrastructure (“U-NII”) bands.”³ Specifically, RADWIN seeks “modification of Section 15.407 of the rules to allow devices that emit multiple directional beams sequentially in the U-NII-1 and U-NII-3 bands to operate at power limits that are allowed for point-to-point systems in those bands.”⁴ GeoLinks supports this rule change.

As an initial matter, and as GeoLinks has advocated in numerous proceedings before the Commission, point-to-multipoint (“P2MP”) technology is ideal to meet the ever-growing need for high-speed broadband throughout the country, especially for rural, unserved areas. While point-to-point (“P2P”) connections have been successful for fixed wireless providers in the 5 GHz band, for example, this approach is limited in its application. Specifically, P2P connections are cost effective for a single connection point (e.g. one school, community anchor institution, or business), but they are not, comparatively, for multiple connections (e.g. multiple residences throughout a community) as they require additional transmission equipment and infrastructure to reach each additional user. P2MP connections, on the other hand, create opportunities to connect multiple users from one transmission point without the need for additional infrastructure. This may include numerous homes or buildings within a densely populated area or homes in rural areas that are, sometimes, miles apart. GeoLinks believes that policies that foster the use of this technology fall squarely within the Commission’s stated goal to “encourages and facilitate an environment that stimulates investment and innovation in broadband technology and services.”⁵

As discussed in the Petition, P2MP systems that utilize electronically steered sequential multiple directional beams will allow users, such as fixed wireless providers, to provide high-quality, broadband connections over the U-NII-1 and U-NII-3 bands with less risk of creating or receiving harmful interference (compared to traditional P2MP systems). Because fixed wireless providers, such as GeoLinks, have no incentive to cause interference (which would only serve to diminish their own signals), the Company believes that the industry as a whole will take great care in coordinating frequencies and transmission paths in order to operate these sequential multiple directional beams in the bands, pursuant to revised rules. For these reasons, GeoLinks

³ Petition at 1.

⁴ *Id.* at 2.

⁵ *Modification of Parts 2 and 15 of the Commission’s Rules for Unlicensed Devices and Equipment Approval*, Report and Order, 19 FCC Rcd 13539 (2004), at para 1.

supports the Petition and urges the Commission to open a Notice of Proposed Rulemaking on this matter.

III. CONCLUSION

Based on the foregoing, GeoLinks supports the RADWIN Petition and urges the Commission to open a rulemaking to consider the rules changes proposed therein.

Respectfully submitted,

GEOLINKS, LLC

/s/ Skyler Ditchfield, Chief Executive Officer

/s/ Melissa Slawson, General Counsel/ V.P of Government
Affairs and Education

July 30, 2018