



Internet and Telephone

4101 Wild Chaparral Drive, Shingle Springs, CA 95682
530-672-1078 • 844-4CALNET • <http://www.cal.net>

30 July 2018

VIA ECFS

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Re: RM-11812, *Amendment of Part 15 of the Commission's Rules To Advance Improved Broadband Services In the U-NII-1 and U-NII-3 Bands*

Dear Ms. Dortch:

Cal.net, Inc. hereby submits the following comments in strong support of the June 18th, 2018 RADWIN LTD petition to modify Section 15.407(a)(1)(iii) and (a)(3) to enable enhanced operations in the 5-GHz U-NII-1 and U-NII-3 bands.

Cal.net is a facilities-based fixed-wireless Internet Service Provider ("WISP") and a Competitive Local Exchange Carrier based in California. We focus almost exclusively on the rural markets of the western foothills of the Sierra Nevada Mountains and currently provide broadband services to many thousands of residential and business customers over an area in excess of 2,400 square miles. In most of our coverage area, the average household density is less than 30 homes per square mile – and in many areas it's significantly sparser than that.

In environments like ours – which are common to many WISPs nationwide – the economics of deploying service to such thinly-populated areas can range from challenging to prohibitive. The type of beam-forming/beam-steering technology exemplified by RADWIN products, combined with the proposed power increases, makes serving these types of rural communities significantly more feasible. Not only do the higher gain and tighter beams enable more customers to be served with higher speeds from any given location, they also provide the secondary benefit of reducing interference in comparison to traditional sectorized wide-beam antennae. The resulting improved spectrum efficiency thus also advances competitive opportunities by allowing more operators to serve a given area.

In summation, Cal.net respectfully urges the Commission to recognize the significant public benefits that an adoption of the proposal would engender, and move to open a Notice of Proposed Rulemaking inviting further comment on the proposed rule changes. The outcome could enable large segments of rural residents to enjoy baseline 25/3-Mbps speeds, or better.

Respectfully submitted,

By: /s/ Kenneth E. Garnett

Kenneth E. Garnett
Chief Technology Officer
Cal.net, Inc.