Keep the CBRS Open for Small Business!

I have been reading about T-Mobile’s request to capture all the CBRS for the carriers, to be auctioned off. I get it! They want it all for themselves. What is the price that American small business pay? I put this together as an open letter to the FCC so Americans can understand how this is going to hurt small business and innovation in LTE. In my opinion, T-Mobile’s greed for spectrum will cost too much for small business to pay. I see this as the “uncarrier” striking a devastating blow into the heart of small companies and innovation that would slow down if not stifle private LTE growth completely. I have to protest! This company claims to be a friend of business, yet, I see it as crushing small businesses, the one thing that they used to support. Let me explain.

# The T-Mobile high-level request:

I am taking this right from the T-Mobile petition found at <https://ecfsapi.fcc.gov/file/106191696422731/T-Mobile%203.5%20GHz%20Petition%20for%20Rulemaking%20--%2012-354%20--%206.17.2017.pdf> in case you want to verify.

***T-Mobile proposes that the Commission initiate a rulemaking proceeding to:***

* *Auction all 150 megahertz of spectrum in the 3.5 GHz band as PALs, with GAA use opportunistically throughout the band.*
* *Authorize PALs on a standard, ten-year license term with renewal expectancy.*
* *Make all PALs available at auction, regardless of the number of applications received.*
* *Permit bidding on specific PAL blocks.*
* *Use Partial Economic Areas (“PEAs”) to license PALs.*
* *Require SAS protection of Citizens Broadband Radio Service Device (“CBSD”) registration information.*
* *Make minor changes to the technical rules governing the 3.5 GHz band.*

The statement that I protest is “*Auction all 150 megahertz of spectrum in the 3.5 GHz band as PALs, with GAA use opportunistically throughout the band.”* This seems like a spectrum grab for the rich. They are trying to crush any small business or enterprise that needs private LTE. While they are selfish in grabbing what they can, they are crushing those who are smaller and in their eyes, less significant.

Honestly, it upsets me that T-Mobile would even suggest keeping all the spectrum for the carriers. They claim to be the uncarrier, yet, that is precisely what we would expect a large faceless organization to do and say! T-Mobile is saying, “I want it all for myself” or maybe you could interpret it as, “It’s my sandbox, and I don’t want you in it!”. I see this as what a large corporation would do when faced with losing a little business. They bully the government into stopping entrepreneurs from building their business so they can grab all the business.

Why does this matter? Because in the USA you have no shot of building a wireless broadband business unless you have billions of dollars to hand over to the FCC. It has stifled and shut down small business. Hey, I love Wi-Fi and the unlicensed spectrum, but the reality is that it is not enough to build a sustainable business with creative business practices. I congratulate Boingo for making it work, way to go! However, to play in the licensed spectrum, you need to bow down to the carriers. It’s not an easy business, and the CCA members outside of Sprint and T-Mobile know that. They are working hard to survive with the leftover spectrum that they have. They can’t live without the big 4, and they know that.

I looked at the CBRS as an opportunity for innovation to happen with the local businesses, the enterprise, the warehouses, the smaller businesses that could innovate in ways that the carrier just don’t care to do unless it appeals to the masses, in their eyes anyway.

This is about freedom and small business. It’s not about T-Mobile’s agenda to own all the spectrum. Don’t get me wrong, I think that the spectrum designated for the PAL should have longer license terms, but they need to stop there and make sure the lightly licensed spectrum is free for all who follow the rules.

While T-Mobile apparently doesn’t see it, they could be able to partner with the small business without rolling out small cells everywhere. They could take this opportunity to work with local businesses to expand their footprint without deploying thousands of small cells in all those areas which they wouldn’t deploy anyway.

# Let’s be clear about how this hurts innovation that small business can provide.

Let me very clear about how this will crush small business. The part that I am upset with is, “*Auction all 150 megahertz of spectrum in the 3.5 GHz band as PALs, with GAA use opportunistically throughout the band.”* Not the rest. I really could care less. Why does this upset me, because it would crush the small business who wants to deploy for a specific reason in a given area?

* How is T-Mobile hurting smaller businesses? Let me count the ways:
  1. Small business can only access license free bands in Wi-Fi. Maybe LTE-U in the ISM band. This band is already overcrowded, but it has allowed for innovation and opened the door for businesses to grow, outside of the carrier space.
  2. Innovation by small business is key, if the carriers own the entire spectrum, then the innovation that comes from small businesses will be crushed in favor of the large carriers pushing their agenda.
  3. T-Mobile in their quest for more spectrum is enticing the FCC with money, obviously. The other large companies are jumping on board to support this. Do you see this as a David versus Goliath? The Larger corporation is pushing government around to get what they want.
  4. How can a small business innovate LTE systems if they don’t have spectrum to work in? How can they serve the enterprise, warehouses, factories, and other private LTE systems? They can’t, and the carriers made it clear that they will NOT spend the money to do this either. So, in going through with this, you have hurt vertical markets which the carriers, like T-Mobile, deem as too small to serve or maybe not enough profit to support. Ask them if they would put small cells in a building that is under 10,000 square feet, would they, go ahead, ask them.

Listen, this is personal for me too. I am one of the people who would love to innovate and deploy systems in the CBRS. I see great opportunity here for all to do this. I feel that the private LTE systems will solve problems for so many small businesses and open the devices to more than just the carriers. I see an expansion of the wireless ecosystem that we have never seen in history. It would free up enough broadband for us to show the FCC what is truly possible outside of the carrier’s realm. This of what we can do together! We can build stores that automate sales and stocking and ordering. It will automate warehouse work to the next level. It will allow secure and private communication in the enterprise. It will open private and secure communications systems where all they have now is Wi-Fi. It will allow neutral host small cells. It could allow small private wireless systems for a campus, secure and private. It’s exciting, and all of us could be involved! A secure system with video and data, all available to any experienced small business to deploy.

# Let’s look at the pros and cons.

## Pros:

* The FCC could rake in another Billion dollars for the national debt.
* More spectrum for the carriers to deliver 5G. By the way, did T-Mobile deploy all that 600MHz yet? Did AT&T deploy all of their spectrum? Did they?

## Cons:

* The carriers get all the spectrum, as they have now, stifling small business and innovation.
* Innovation will be stifled unless the carriers see a mass appeal.
* Private LTE systems will be limited to unlicensed bands sharing with Wi-Fi.
* Small companies will be pushed out of the wireless arena again.
* Enterprise systems will not have wireless LTE in their business plan unless the carriers allow it.
* More spectrum for small business to deliver 5G.
* All spectrum will be a commodity for the carriers and no other businesses unless they pay the carriers for service, outside of the ISM band which is already overcrowded.

The carriers will continue their ***monopoly*** on broadband spectrum in the USA.

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