



August 3, 2017

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

Re: Petition for Rulemaking to Amend and Modernize Parts 25 and 101 of the Commission's Rules to Authorize and Facilitate the Deployment of Licensed Point-to-Multipoint Fixed Wireless Broadband Service in the 3700 – 4200 MHz Band, RM-11791

Dear Ms. Dortch:

As a member of the Broadband Access Coalition (www.broadbandamerica.org), JAB Wireless, Inc. (dba Rise Broadband) urges you to support allowing 3700-4200 MHz spectrum to be used for licensed, Point-to-Multipoint fixed wireless services to deliver gigabit and near-gigabit speeds to rural Americans. The Broadband Access Coalition, a large and diverse group of tech companies, broadband ISPs, and non-profit public policy groups, has petitioned the FCC to open up the airwaves for spectrum to create this new super-fast broadband service for America.

For background, Rise Broadband is a Colorado based fixed wireless service provider offering high speed internet and digital telephone service to primarily rural Americans that were underserved with broadband, or have limited choices of broadband. We are the largest provider of fixed wireless broadband services in the country. Our 800+ employees serve more than 180,000 people in 16 states, primarily using unlicensed spectrum in 5 GHz, licensed spectrum in 2.5 GHz and "lightly licensed" spectrum in the 3650-3700 MHz band.

Fixed wireless service ("fixed" meaning service to a place such as a home or a business, not "mobile" wireless such as a cell phone) delivers a robust broadband service with residential speeds today up to 100 Mbps with generous data caps. It is estimated over 2,000 fixed wireless service providers currently serve over 3 million Americans, primarily in areas where people have little to no other choice of broadband. The primary reason fixed wireless has become such an effective solution in rural America is the fact fixed wireless networks can be constructed for a fraction of the cost of fiber or other wireline alternatives. This cost advantage allows small fixed wireless service providers to be profitable in areas where larger wireline operators and mobile carriers do not deploy the bulk of their network resources.



The mobile industry will plead that spectrum in the 3700-4200 MHz band is needed to augment network capacity due to congestion. Mobile network congestion occurs mostly in high population density areas, and those making this argument are already sitting on unbuilt spectrum in lower population density areas. Creating the opportunity to warehouse more unbuilt spectrum is not in the public interest. Low band spectrum and additional infrastructure are keys to improving mobile coverage in less dense areas, whereas spectrum such as 3700-4200 MHz is well suited to accommodate excess data capacity needed in high population density areas for things like stadiums, convention centers, and urban hot spots.

3700-4200 MHz hits the sweet spot for rural, fixed wireless terrestrial services. Unlike 5 GHz or higher bands, these bands allow greater success connecting homes and business through obstructions such as trees and buildings, and LTE network equipment for fixed wireless will be easily adaptable to this band given the world is already deploying fixed wireless gear in the 3500-3700 MHz bands. This is critical spectrum that will enable Americans to receive gigabit and near-gigabit speed services in areas already served by fixed wireless service providers, and typically ignored by the large operators.

Do not allow the urban, capacity needs of the mobile industry to overshadow the basic broadband needs of 23 million Americans that can be helped immediately with this spectrum. Simply putting 3700-4200 MHz spectrum to auction insures only the largest of companies will have access to the spectrum, where naturally their priorities are to serve the greatest number of people in the densest areas. This only serves to perpetuate the digital divide – make this spectrum available to all, so all may be served.

Sincerely,

A handwritten signature in blue ink, appearing to be "JK" or "Jeff Kohler", written over a light blue horizontal line.

Jeff Kohler, Co-Founder and Chief Development Officer
JAB Wireless, Inc. dba Rise Broadband