

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

In the Matter of)	
)	
Amendment of Part 90 of the Commission's)	WP Docket No. 07-100
Rules)	

REPLY COMMENTS OF CALIFORNIA INTERNET, L.P. DBA GEOLINKS

California Internet, L.P. DBA GeoLinks (“GeoLinks” or the “Company”) submits these reply comments in response to the Commission’s Sixth Further Notice of Proposed Rulemaking in the above-captioned proceeding.¹

I. INTRODUCTION

GeoLinks largely supports the comments filed by the Wireless Internet Service Providers Association (“WISPA”) and Federated Wireless. As an initial matter, and as both WISPA and Federated Wireless point out, the 4.9 GHz band is highly underutilized.² To meet the Commission’s stated goal “to ensure that public safety continues to have priority in the band while opening up the band to additional users that will facilitate increased usage,” both parties propose sharing techniques that would allow commercial users to utilize the band while protecting public safety users from harmful interference. GeoLinks believes that this approach is appropriate for the 4.9 GHz band and will help the Commission reach its stated goals.³

¹ *Amendment of Part 90 of the Commission’s Rules*, Sixth Further Notice of Proposed Rulemaking, WP Docket No. 07-100, FCC 18-33 (rel. March 23, 2018) (“FNPRM”).

² See Comments of the Wireless Internet Service Providers Association, WP Docket No. 07-100 (filed July 6, 2018) (“WISPA Comments”) at 2 and Comments of Federated Wireless, Inc., WP Docket No. 07-100 (filed July 6, 2018) (“Federated Wireless Comments”) at 3.

³ While GeoLinks proposed that sharing within the band be conducted on a licensed or light-licensed approach, the Company is not opposed to implementation of a dynamic spectrum sharing approach. That said, GeoLinks urges the Commission to continue to consider licensed or light-licensed approaches for other bands that are well-suited for fixed wireless broadband use.

II. DISCUSSION

As the Commission explains, the 4.9 GHz. Band has “fallen short of its potential.”⁴ Despite the fact that the Commission has recognized the underutilization of the band, some commenters attempt to persuade the Commission that the 4.9 GHz band should not be opened up to commercial use. The Region 21 700 MHz Planning Committee appears to urge the Commission not to open the band up to any additional licensees claiming that “additional spectrum exists to accommodate these users.”⁵ In addition, the Utilities Technology Council, the Edison Electric Institute, the National Rural Electric Cooperative Association, and the GridWise Alliance (“UTC/EEI/NRECA/Gridwise”) assert that doing so “would threaten to diminish the reliability of the band, which would in turn discourage investment by utilities and public safety and indeed effectively displace them from the band as a practical matter.”⁶

GeoLinks asserts that the band can be utilized for commercial users while also ensuring protection for public safety users. By utilizing an automated spectrum management database system, such as those proposed by WISPA and Federated Wireless, the band could support “dynamic secondary use of the 4.9 GHz band while ensuring that primary public safety users maintain priority access and are able to operate across the band without interference from secondary users.”⁷ As Federated Wireless explains, dynamic shared spectrum is already well understood and is becoming more readily recognized for its capabilities to effectuate enhanced spectrum usage and protect users from harmful interference.⁸

In addition, GeoLinks believes that opening up the 4.9 GHz band to commercial users will *encourage* investment in the band by all users, not diminish it as UTC/EEI/NRECA/Gridwise suggests. Specifically, allowing commercial users (i.e. those with commercial capital) to utilize the band will promote technological improvement by driving up demand for compatible equipment, which, in turn, will drive down price. Moreover, as both WISPer and Federated Wireless point out, the 4.9 GHz band is in “spectral proximity” to the 5

⁴ FNPRM at para 1.

⁵ Comments of Region 21 700 MHz Planning Committee, WP Docket No. 07-100 (filed July 6, 2018) at 3.

⁶ Comments of the Utilities Technology Council, the Edison Electric Institute, the National Rural Electric Cooperative Association and the Gridwise Alliance, WP Docket No. 07-100 (filed July 6, 2018) at 3.

⁷ WISPA Comments at 5.

⁸ See Federated Wireless Comments at 6.

GHz and 3.5 GHz bands.⁹ GeoLinks believes that use of the 4.9 GHz band by commercial entities will encourage equipment manufacturers to create equipment that is also compatible for these other bands, increasing equipment efficiency and encouraging additional investment in the band. This will benefit not only commercial users but primary, public safety users, as well.

III. CONCLUSION

Based on the foregoing, GeoLinks urges the Commission to allow for commercial use of the 4.9 GHz band on a secondary basis through dynamic spectrum sharing.

Respectfully submitted,

GEOLINKS, LLC

/s/ Skyler Ditchfield, Chief Executive Officer

/s/ Melissa Slawson, General Counsel/ V.P of Government
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⁹ See WISPA at Comments at 6 and Federated Wireless Comments at 17.