



Dated 8/7/2017

In the matter of the requested Petition for Rulemaking on using the 3700 to 4200 MHz band of spectrum before the Commission for rural & urban broadband..

Here are the comments of Slopeside Internet, a fixed wireless Internet provider (aka WISP) in the rural mountains of Colorado that has been helping people get access to broadband in places that there is none.

#### FIXED WIRELESS TECHNOLOGY CAN BE A SOLUTION GIVEN THE CHANCE

Fixed wireless technology is quietly sweeping the world as it offers the right price/performance technology to fix Internet access problems in almost all corners of the globe. Fixed wireless is now doing this as mobile voice did in the late 80's and 90's--and continues to do.. but fixed wireless will act as a "force multiplier" for mobile. (in both urban and rural places alike)

With this global growth, a new dynamic is emerging in the US that integrates fixed wireless into the ever evolving broadband infrastructure landscape here. Hybrid networks that integrate the needed technologies to build networks of the future need to be sustainable in their both their business model and ability to scale at reasonable cost--rural or urban.

With this Petition for Rulemaking, the US could be at a crossroads about our spectrum policy. Simply put, do we innovate and create a more dynamic & "value creating" set of rules based on America's need to compete in future & expanding global markets? ..or do we continue the heavily subsidized and "highly leveraged business models" and a "captured" spectrum policy from the past?

We urge the FCC and Lawmakers alike to think long term and act as to support this Nation broadband needs in the future.

#### ECONOMICS MATTER !!

Economically speaking, the value creation so often associated with spectrum auctions for cellular also needs to be re-evaluated. The simple fact is a strong domestic US economy is what matter most.. not taxing the American consumer thanks to their need to use mobile voice and data services so the cellular spectrum "bank" can buy spectrum access rights from the US government.

The Commission needs to re-think this economic foundation of US spectrum policy so that it is based on broad value for the US economy as a whole--not just the industry that have the most to gain.

As such.. this Petition must be supported for the sake of both US spectrum policy innovations and the vibrant US broadband eco-system of the future.

This Petition can also be a solution to the huge gulf that exists economically between rural and urban setting.

So much of spectrum & and Internet policy is driven by business models that are best supported in urban core markets that enable scale and often support a solid business model. But that same urban core business model has never worked well in rural markets--even when those same business models are heavily subsidized with Federal money.

The fact is that 3700 to 4200 MHz is a very important policy & spectrum "investment" that the Commission must assure gets made by our Nation. The global economic world is "shrinking" and innovation and Nation-states who invest in it, are those who will have the most competitive advantage in the very different economic environment of the future.

## THE IMPORTANCE OF SUPPORTING INNOVATION

Supporting innovation by supporting hybrid fiber/fixed wireless network technology & the spectrum it uses can be a more cost effect & scalable foundation for the fast evolving mobile services that are still growing in demand--both in rural & urban areas alike.

Slopeside Internet believes that 3700 to 4200 is a key opportunity to innovate in ways that could support the development of a future multi-band wireless eco-system.. and eco-system what could see scarcity of spectrum assets all but vanish geographically speaking--except in the most dense urban core markets..

As the US relies on the FCC to chart our nation's future course in building and supporting a future looking broadband infrastructure, it is so important to understand that the Nation-states who support spectrum policy innovation (such as bringing 3700 to 4200 into its highest and best use) will also be the purveyor of this value in the world's global markets.

This is why we've invested in supporting those who are building the CBRS and SAS technology that support 3550 to 3700. The US can and should be a key innovator that leads the global markets to a new level of spectrum efficiency and value creation thanks to building these innovation--and this 3700 to 4200 MHz Petition for Rulemaking can leverage these other investments!

The US should be driving future innovation--not let other nation-states do so-- just so US interests can pull just a little more return on investment out of older business models at the cost of future markets and growth..

## WE URGE THE FCC & CONGRESS..

There are many things implied but not discussed in these comments. The one we hope to emphasis is the simple fact that rural places in the US--at the same time as being the most difficult & costly places to do broadband infrastructure--as also the areas that need the economic benefit of broadband the most.

In rural Colorado, there are many small towns and cities (FYI about a 1/3 of the State of Colorado's population is rural) that dream about being able to leverage broadband to bring in non-location specific jobs and services to help their local economies. This is the promise of using the 3GHz band (both 3700 to 4200 & w/3550 to 3700) will deliver to this nation's rural economic needs.

Our Nation must make every effort to take the long view with this rulemaking if US interest are to be served. Both the interest of incumbent spectrum users of today--and the future public good & the products & service they create--can be balanced to support long term economic outcomes. This Petition can & should achieve the highest and best use of this spectrum for our Nation and raise all boats.

Why is this important? The Internet Technology Infrastructure world moves at a lightening pace, and the FCC must be mindful that Nations who keep up with it, will be economic powerhouses in a future.. In short we need rural markets in the US to be able to step up as well as the urban core.

We urge the Chairman and Commissioner to support this very important future-looking rulemaking as it could turn out to be as it may be as important to the US (and the world) as WiFi & mobile cellular has been in the past.

Respectfully submitted,

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