



August 7, 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 FCC'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
Comments of Virginia Everywhere, LLC dba All Points Broadband

Dear Ms. Dortch:

I am writing on behalf of Virginia Everywhere, LLC (dba All Points Broadband). All Points is a member of the Broadband Access Coalition ("Coalition") and strongly supports the Coalition's petition for unleashing the potential of the 3700-4200MHz band (the "Band") to solve one of the most pressing public policy challenges: the digital divide.

As background, All Points is a fixed wireless Internet service provider serving northern and southwestern Virginia and communities in Maryland and West Virginia. All Points has been in business for less than three years and now serves approximately 15,000 end-users. We raised private, at-risk capital from institutions and individuals which we deploy to bring broadband service to areas where there are no terrestrial alternatives or a lack of choice. Our young, entrepreneurial company is an example of the private sector's willingness to invest in rural broadband if there is a sensible regulatory environment that encourages investment.

I also serve on the Board of Directors of the Wireless Internet Service Providers Association and am Chairman of its Legislative Committee. I have testified before the United States Senate on matters relating to rural broadband deployment.

All Points is one of thousands of smaller, fixed-wireless ISPs that are investing private capital to connect unserved Americans in areas that incumbent wireline providers have ignored. Providing companies such as ours with access to additional mid-band spectrum will enable us to (1) rapidly serve additional customers who cannot be served with our current equipment (which requires line-of-sight) and (2) increase the speeds we offer consumers—including plans with download speeds well in excess of 100mbps.

If the Band is allocated for mobile use and auctioned over large geographic areas, it will primarily be deployed in dense urban areas and companies such as All Points will be priced out of any spectrum auctions.

All Americans need access to fixed, high quality, and unlimited Internet service. What other item before the Commission is more important than ensuring they have it? Adopting the proposal set forth in the Coalition's petition is the fastest way of achieving this outcome. The desire of mobile carriers to obtain additional spectrum for relieving mobile congestion should not outweigh the overriding public policy priority of connecting all Americans.

Sincerely,

/s/

James G. Carr
Chief Executive Officer