

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

In the Matter of)	
)	
Petition for Rulemaking to Amend and)	RM-11791
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)	

COMMENTS OF CALIFORNIA INTERNET, L.P. DBA GEOLINKS

California Internet, L.P. DBA GeoLinks (“GeoLinks” or the “Company”) is proud to service the largest coverage area of any single fixed wireless Internet service provider (“ISP”) in the state the California. While the Company had previously focused on business and enterprise customers, since 2016, GeoLinks expanded its customer base to include nearly 30 rural school districts and surrounding communities throughout the state that previously had not had access to any high-speed broadband service. As the Company expands, it strives to reach more unserved and underserved areas within California and beyond. GeoLinks provides these comments to urge the Commission to adopt the recommendations set forth in the Petition for Rulemaking submitted by the Broadband Access Coalition (“Petition”)¹ and create new rules for the 3700-4200 MHz band that allow small and mid-sized ISPs to continue to deliver much-needed high-speed broadband services.

As discussed in the Petition, millions of Americans lack what is, by today’s standards, considered high-speed broadband access - this is especially true in rural areas.² Sparsely populated rural areas are not well suited for traditional, wired broadband service given the cost to build and deliver a cable/ fiber-based network. With the emergence and growing popularity of fixed wireless technology, new opportunities to connect rural communities are becoming available. However, there is a need for public policy that allows for these opportunities to become realities to benefit rural America.

Traditionally, fixed wireless ISPs have operated in unlicensed bands (i.e. 2.4 and 5 GHz). While this has allowed for successful deployment internet services in some areas, the availability of unlicensed bands is not a one-size-fits-all option. As an initial matter, point-to-point licensed services (in the 6, 11, 18 and 23 GHz bands) are very expensive to deploy, requiring additional

¹ *In the Matter of 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*, Petition for Rulemaking of the Broadband Access Coalition, RM-11791, filed June 21, 2017 (“Petition”).

² See Petition at 9.

equipment and infrastructure to then provide connections to multiple users. In addition, bandwidth over these connections is very limited in urban, suburban and some rural areas making them only suited for backhaul. Moreover, point-to-multipoint (“P2MP”) services, which create opportunities to connect multiple users in a more cost-effective manner (even if miles apart), are susceptible to congestion and interference caused from extensive use of the unlicensed bands, especially in urban, highly-populated areas. This makes high-quality P2MP connections over unlicensed spectrum nearly impossible in some areas.

GeoLinks supports shared, licensed P2MP use of the 3700-4200 MHz band. As explained in the Petition, the Commission has had demonstrated success with “light licensing” and spectrum sharing regimes in other bands. GeoLinks believes that this type of licensing regime would prove successful for the 3700-4200 MHz band, as well.³ First, this kind of spectrum allocation creates regulatory certainty that is imperative to spur investment in robust P2MP networks and equipment. Second, it promotes competition among wireless broadband providers without limiting spectrum resources to only those companies with large amounts of capital to spend on dedicated spectrum or those who would purchase it as an asset with no intention of utilizing it. Third, and most importantly, it ensures broad use of the band without risking the congestion and interference currently found in the unlicensed bands (i.e. 5 GHz).⁴

In conclusion, GeoLinks urges the Commission to adopt the recommendations set forth in the Petition to ensure policies that allow small and mid-sized ISPs to deliver much-needed high-speed broadband services to areas where traditional, wired services are lacking.

Sincerely,

/s/

Skyler Ditchfield
Chief Executive Officer
California Internet, L.P. DBA GeoLinks

³ GeoLinks believes that a similar approach to that proposed by the Petition would also be optimal for the 6.0-7.0 GHz and 24 GHz bands and any other P2MP bands being considered in higher frequencies. Specifically, GeoLinks supports a “light licensed” or Part 101-type licensing in these bands that would allow P2MP operation for Urban environments where fully-licensed P2MP spectrum is not currently affordable to mid-sized operators. Moreover, with respect to the 24 GHz band, equipment manufacturers have already developed equipment that could be put to use into use via existing chipset were the band to be opened to P2MP operation. This would allow for cost-effective fiber extension in urban environments where such construction is currently cost-prohibitive.

⁴ As noted in the Petition, the availability of 500 MHz of contiguous spectrum can enable providers to deliver robust internet solutions of up to a gigabit with proper channel size allocations. GeoLinks supports this type of licensing approach. *See* Petition at 17.