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To whom it may concern,

I am writing in support of the CBRS rules changes supporting multi-point use for wireless ISPs. While I am currently in the planning stages of my own ISP, and plan to start operation within the next 6 months to a year, I have worked with and run other ISPs in both the wired and wireless arenas. I have also deployed private unlicensed wireless networks for a number of customers in numerous spectrum bands including 2.4 GHz, 5 GHz, 18 GHz, 24 GHz, and 80 GHz. In addition to terrestrial wireless networks, I have operated various two-way satellite networks in various bands including C, X, Ku, and Ka band.

One area of concern in starting my own ISP has been which frequency bands to utilize. Given my financial resources, I will largely be constrained to use unlicensed or light licensed frequency bands. Another on-going concern is the availability of spectrum in which to deploy networks where interference from other users will be minimal and where interference that I may cause to other users will also be minimal. Often, I see highly utilized spectrum which makes picking a frequency to use challenging. Opening up the 3.7 – 4.2 GHz band to point-to-multipoint use will offer additional space in which to effectively deploy and grow my ISP, and encourage more competition in the small wireless ISP arena. The light licensing model will allow me to better provide a highly reliable service to my customers due to the benefits the licensing provides but at a cost that is friendly to my small business.

My ISP is planning to bring next-generation broadband services and speeds to customers in primarily rural but also suburban areas. I plan to offer 100 Mbps bandwidth service over wireless to customers and plan to grow the bandwidth offerings as time goes on and the customer base grows. Again, opening up 3.7 – 4.2 GHz to multipoint use will be critical in deploying my network effectively.

Purchasing spectrum at auction for me is a non-starter primarily due to the expense involved of both licensing and equipment. Numerous equipment manufacturers have produced quality equipment for both point-to-point and point-to-multipoint networks at price points which are acceptable to a small to medium sized ISP but these are primarily offered in the unlicensed frequency bands which comes with some problems related to potential interference from the unlicensed nature of the bands.

Having access to more spectrum in a light licensing model is a boon for small wireless ISPs such as mine and I strongly encourage the FCC to adopt rule changes to the CBRS band which will enable me to more effectively compete and share strained resources with others wishing to offer similar services while maintaining a higher quality of service for customers.

Thank you for your consideration,

Ryan Wilkins

Elevated Networks, LLC