

**Federal Communications Commission**  Date: August 7, 2017

445 12th Street SW

Washington, DC, 20554

RE: **Broadband Access Coalition 3.7 GHz Band Petition for Rulemaking (RM-11791)**

To Whom It May Concern,

I am writing on behalf of Hudson Valley Wireless. We are a Competitive Local Exchange Carrier (CLEC) focused on deploying broadband Internet Access to unserved / underserved communities. We also provide Backup Internet and Transport Solutions for Enterprise and Businesses.

Many of the markets we serve, do not have access to affordable wireline solutions. In many cases, these communities rely on a small regional provider as a last resort for providing Broadband Internet Access. Consumer are demanding faster speeds and providers need access to affordable spectrum.

Existing unlicensed bands are becoming oversaturated and we need more spectrum to meet consumer demand. We strongly encourage the FCC to open up 3700 – 4200 MHz for fixed-wireless use, providing an additional 20/40/80/160 MHz of lightly licensed spectrum for us to bring more users online.

We are ultimately concerned about the potential impact of auctioning the spectrum. The larger mobile wireless providers have a competitive advantage and smaller regional providers may not be able to participate in the auction. We can assume that large portions of the spectrum will go unused (warehoused) increasing the digital divide between urban and rural users.

On behalf of Hudson Valley Wireless, we respectfully ask the commission to keep 3700 – 4200 MHz out of auction or to follow a similar model to CBRS using a SAS. This would remove barriers to deployment and allow smaller regional providers access to the spectrum.

Sincerely,

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