

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

In the Matter of	)	
	)	
Expanding Flexible Use of the 3.7 to 4.2 GHz Band	)	GN Docket No. 18-122
	)	
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 3.7-4.2 GHz Band	)	RM-11791
	)	
Fixed Wireless Communications Coalition, Inc., Request for Modified Coordination Procedures in Band Shared Between the Fixed Service and the Fixed Satellite Service	)	RM-11778
	)	

To: The Commission

**COMMENTS OF AIRSPAN NETWORKS INC.**

Airspan Networks Inc. ("Airspan") hereby submits its Comments in response to the above-captioned Order and Notice of Proposed Rulemaking GN Docket No. 18-122, (*"NPRM"*)<sup>1</sup>, Petitions for Rulemaking RM-11791<sup>2</sup> and Petition for Rulemaking RM-11778<sup>3</sup>.

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<sup>1</sup> *Expanding Flexible Use of the 3.7 to 4.2 GHz Band*, GN Docket No. 18-122, Order and Notice of Proposed Rulemaking, 33 FCC Rcd 6915 (2018) (*Notice*), FCC DA 19-678 (rel. July 19, 2019) ("Public Notice").

<sup>2</sup> *Petition of Broadband Access Coalition for a 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*, RM- 11791, Public Notice, Consumer and Governmental Affairs Bureau Reference Information Center Petition for Rulemaking Filed, Report No. 3080 (CGB, July 7, 2017).

<sup>3</sup> *Fixed Wireless Communications Coalition, Inc., Petition for Rulemaking, Request for Modified Coordination Procedures in Bands Shared Between the Fixed Service and the Fixed Satellite Service* Petition for Rulemaking, RM-11778 (filed Oct. 11, 2016) ("FWCC Petition").

Airspan (OTC Markets: *AIRO*) is a USA based leading 4G LTE, 5G, Citizens Broadband Radio Service (CBRS) and rural broadband Fixed Wireless Access solution supplier, with over 6,000 customers in over 170 countries, headquartered in Boca Raton, Florida. In November 2019, Airspan fully acquired Mimosa Networks, Inc., a founding member of the Broadband Access Coalition and co-author of RM-11791.

We find the results of the Reed Engineering study<sup>4</sup> intriguing, and based on those results, there may be significant opportunities to bring fixed wireless point to multipoint (P2MP) access to tens of millions of Americans in shared C-band spectrum.

As an existing supplier of both 5G, CBRS and rural Wireless ISP (WISP) focused fixed wireless equipment, Airspan believes is possible to rapidly adapt existing equipment to be used for C-band operation. Based on Airspan's experience implementing spectrum sharing techniques with CBRS as well as coordination based fixed wireless licensing (via FCC ULS and Part 101), we believe that the Reed Engineering study results and recommendations are feasible to implement rapidly and cost-effectively.

Airspan also encourages approaches that provide incentives to transition multichannel video programming distributors (MVPDs) to fiber distribution as proposed by the ACA Connects Coalition, however as a standalone approach, this proposal would dramatically slow down access to the spectrum for 5G and P2MP access while waiting for such an infrastructure build out. This could potentially leave many rural areas further behind in accessing C-band spectrum for flexible wireless use as these areas are significantly more costly and time consuming to connect via fiber. The ACA Connects Coalition proposal also calls for transitioning up to 370 MHz for flexible

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<sup>4</sup> Letter from Wireless Internet Service Providers Association, Google LLC, and Microsoft Corp. to Marlene H. Dortch, Secretary, FCC, GN Docket No. 18-122 (filed July 15, 2019), Attachment (Reed Study)

wireless use, however this will require substantially more complexity and time to transition all MVPD use to fiber and reallocating all other Fixed Satellite Service uses to the remaining 130 MHz. It also will harm small rural Wireless ISPs, who are in immediate need of additional sub-6 GHz P2MP spectrum to service under-connected rural areas, by delaying access to the spectrum and relying solely on a flexible use auction approach across the cleared band which is less favorable to small business ISPs versus spectrum sharing approaches.

For the reasons above, Airspan encourages the Commission to adopt the Reed Engineering study's spectrum sharing recommendations. We believe this approach strikes a strong balance for rapidly delivering 5G spectrum by clearing a portion of the lower C-band, protecting incumbent Fixed Satellite Services (FSS) use (immediately and during a 5G reallocation process), as well as the rapid creation of an affordable rural P2MP fixed wireless spectrum sharing service that will greatly assist broadband connectivity in rural areas.

Respectfully submitted,

**Airspan Networks Inc.**

/s/ Jaime A. Fink

Jaime A. Fink

Airspan Networks Inc.

777 Yamato Road, Boca Raton, Florida, 33431

[jfink@airspan.com](mailto:jfink@airspan.com)

Vice President Technology, Fixed Wireless

August 7, 2019