

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)	RM-11791
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-11778
)	
Fixed Wireless Communications Coalition, Inc.,)	
Request for Modified Coordination Procedures in)	
Band Shared Between the Fixed Service and the)	
Fixed Satellite Service)	
)	
)	
)	

**COMMENTS OF FRONTIER COMMUNICATIONS
CORPORATION AND WINDSTREAM SERVICES, LLC**

Frontier Communications Corporation (“Frontier”) and Windstream Services, LLC (“Windstream”) hereby submit comments in support of the July 15, 2019 co-channel coexistence study prepared by Jeff Reed of Virginia Tech and Reed Engineering (the “Reed Study”) on behalf of WISPA, Google and Microsoft.¹ The Reed Study was submitted in response to the *3.7 to 4.2 GHz Notice of Proposed Rulemaking (“NPRM”)*,² and the Commission has invited

¹ See 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*”), available at [https://ecfsapi.fcc.gov/file/10715379201594/Joint%20Ex%20Parte%20Letter%20\(WISPA%20Microsoft%20Google\).pdf](https://ecfsapi.fcc.gov/file/10715379201594/Joint%20Ex%20Parte%20Letter%20(WISPA%20Microsoft%20Google).pdf).

² *Expanding Flexible Use of the 3.7 to 4.2 GHz Band*, Order and Notice of Proposed Rulemaking, GN Docket No. 18-122, FCC 18-91 (July 12, 2018) (“*NPRM*”).

comment on, among other things, the conclusions in the Reed Study regarding shared C-band use.³ Frontier and Windstream strongly support the Commission’s further exploration of the conclusions in the Reed Study to speed rural broadband expansion and further consideration of enabling fixed wireless use cases in rural areas. Frontier and Windstream also strongly support a public process for any cleared spectrum,⁴ as opposed to a private closed-door sale of the spectrum, and further exploration of enabling rural fixed use cases to the extent the Commission pursues any migration of satellite operators to fiber in the band.

Between the two companies, Frontier and Windstream have successfully expanded broadband to millions of rural Americans and are eager to continue bringing faster broadband to millions more.⁵ As part of both Frontier’s and Windstream’s rural broadband expansion, Frontier and Windstream are busy deploying wireless broadband, including using mid-band spectrum.⁶ Our companies believe, and as we have explained in this and other dockets, that smart rules enabling fixed point-to-multipoint deployments would provide another key tool in the toolbox to reach the hardest to serve rural Americans.⁷

³ See *Wireless Telecommunications Bureau, International Bureau, Office of Engineering and Technology, and Office of Economics and Analytics Seek Focused Additional Comment in 3.7-4.2 GHz Band Proceeding*, Public Notice, DA 19-678 (July 19, 2019), <https://docs.fcc.gov/public/attachments/DA-19-678A1.pdf>.

⁴ See, e.g., Letter from ACA Connects, CCA, and Charter, to Marlene H. Dortch, Secretary, FCC, GN Docket No. 18-122 (filed July 2, 2019) (ACA Connects Coalition Proposal)

⁵ See generally, Comments of Frontier and Windstream, GN Docket Nos. 18-122, 17-122, RM-11791, & RM-11778 (Oct. 29, 2018) (“*C-Band Comments*”).

⁶ *C-Band Comments*, p. 2.

⁷ See, e.g., *C-Band Comments*; Comments of Frontier, Windstream, and Consolidated, GN Docket No. 17-183 & RM-11791 (Oct. 2, 2017) (“*Mid-Size ILECs 3.7-4.2 Comments*”);

As both companies have expressed previously, Fixed Satellite Service (FSS) and fixed wireless are less likely to interfere with one another than mobile services.⁸ Thus, the Reed Study’s conclusion that exclusion zones of about 10 kilometers are sufficient to protect most FSS earth stations from harmful interference caused by properly-engineered co-channel point-to-multipoint broadband systems is compelling and worthy of further exploration by the Commission. Frontier and Windstream believe that this conclusion, which would enable fixed operations in 78% of the country, with the greatest availability in rural areas and covering more than 80 million people, has the potential to bring faster broadband to millions more across the country.

Frontier and Windstream also strongly support a public process associated with the spectrum and a continued focus on enabling rural fixed wireless use cases. All major U.S. spectrum policy decisions to date have been made through a public process, and a private sale risks thwarting the public interest and failing to ensure this spectrum achieves its highest and best use. Additionally, as our companies have explained in many other contexts, this mid-band spectrum offers a unique opportunity for enabling another valuable tool in the toolkit for rural broadband deployment, and the Commission should continue to explore making additional spectrum available to enable for rural fixed wireless use cases. If, for instance, the Commission pursues relocation of satellite services to fiber, as envisioned under the ACA Connects proposal, the Commission should explore enabling rural fixed wireless use cases with this cleared spectrum. Clearing the band to enable higher value use cases makes good policy sense given the

Comments of Frontier, Windstream, and Consolidated, GN Docket 17-258 (Dec. 28, 2017) (“*Mid-Size ILECs CBRS Comments*”).

⁸ *C-Band Comments*, p. 4.

higher value this spectrum has for terrestrial uses, and the Commission should pursue enabling rural fixed wireless as part of any such package, whether reserving rural spectrum for fixed broadband deployment, allowing dynamic spectrum access and opportunistic use, as part of the Rural Digital Opportunity Fund, or other strategies.

Frontier and Windstream enthusiastically support further exploring these conclusions expeditiously as the Commission has an opportunity to accelerate multi-billion-dollar broadband investments to unleash faster broadband for even more rural Americans. By doing so, the Commission can accomplish its dual goals of promoting 5G leadership and closing the digital divide.

Respectfully submitted,

FRONTIER COMMUNICATIONS

/s/ AJ Burton

Thomas Whitehead
WINDSTREAM SERVICES, LLC
1101 17th Street, NW, Suite 802
Washington, DC 20036
(202) 223-7664

AJ Burton
Diana Eisner
FRONTIER COMMUNICATIONS
1800 M Street, NW, Suite 850S
Washington, DC 20036
(202) 223-6807

August 7, 2019