

# Mimbres

## Communications

7 August, 2017

Marlene H. Dortch, Secretary  
Federal Communications Commission  
RE: RM-11791

We would like to voice our enthusiastic support for RM-11791, the Broadband Access Coalition 3.7 GHz Band Petition for Rulemaking.

Mimbres Communications is a fixed wireless service provider operating in rural Grant County, New Mexico. Approximately two thirds of our county residents live areas with very low population density with little to no choice of broadband providers.

The Proposal would make 500 MHz of mid-band spectrum quickly available for lightly licensed PtMP use, maximizing sharing of precious spectrum resources while ensuring protection of incumbent users in the band. Managing this spectrum via an updated Part 101 coordination processes would bring rapid innovation to a currently underutilized band having highly desirable propagation characteristics.

A traditional spectrum auction would require us to bid on a license covering multiple counties, traversing mountain ranges and areas where we would never realistically be able to provide service. The semi-urban portions of our county represent a completely different business case, some of which can be economically served by FTTH. Licensing by location -- taking beamwidth, azimuth, and ERP into account though Part 101 coordination procedures would enable faster, more affordable service to large portions of rural America.

The Proposal's initial licensing limit of 40 MHz per licensee would allow us to offer 200/50 mbits/sec plans to residents of rural Grant County, NM within 12 months of its adoption. Current offerings to these areas top out at 4-10 mbits/sec download speed depending on location. The ultimate allowance of 160 MHz per licensee would facilitate our eventual offering of full gigabit service to the most remote areas of our county, something which (due to the extremely low population densities) will never pencil out using fiber optic distribution.

The Commission should move quickly to implement an NPRM for this critical infrastructure issue.

Thank you;



Kurt Albershardt  
Managing Member  
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Silver City, New Mexico