



August 8, 2017

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Reply Comments of Telrad Networks, Ltd.
Citizens Broadband Radio Service
GN Docket No. 12-354, RM-11778 and RM-11789

Dear Ms. Dortch:

Founded in 1951, Telrad Networks, Ltd. is an Israeli-based wireless technology company that is developing innovative products for our customers around the world. Our solutions enable the delivery of high capacity, reliable, and scalable broadband wireless access (BWA) services for both service providers and private networks. In the United States, Telrad has focused a substantial amount of money and resources in sales and marketing of LTE equipment in the 3650-3700 MHz band. Our customers include fixed wireless service providers, municipalities, and oil and gas companies, all of which serve small geographic areas or specific business and industrial communications purposes. With well over 200 commercial networks in the region, our customers have deployed thousands of LTE base stations (eNBs) and are serving tens of thousands of customers, primarily in rural America, where broadband options were previously limited or not available. Our LTE solution has enabled the delivery of cost effective broadband services to rural America, providing robust internet to Americans who deserve and need this access.

Telrad's business in the United States has been enabled in large part by the rules adopted for the 3550-3700 MHz band two years ago. Seeing a major opportunity in this Citizens Broadband Radio Service (CBRS) band, we made a strategic decision to invest significantly in technology focused on the U.S. market. We have been heavily involved in industry organizations focused on CBRS, and have worked closely with other companies to adapt our technology to operate under the new Part 96 rules. Having deployed multiple trial operations under experimental licenses our operator customers have obtained, we have demonstrated how our 3650-3700 MHz equipment may be easily software upgraded to operate across the entire 150 MHz band. This is accomplished in software alone, leveraging equipment that our customers have deployed since 2012. This provides a tremendous economic benefit for our customers, allowing for the use of this new 100 MHz of spectrum without additional capital investment or costly truck rolls to replace equipment. The result is vastly improved network performance, an even better broadband experience, and economics that translate to more affordable broadband for their customers. Our investments and business plan, and those of our customers, have relied heavily on the FCC's rules. Telrad is eagerly awaiting the certification process, and the ability to commercially deploy in the CBRS band as soon as possible. The timing of this certification is critical to our business, that of our customers, and to tens of thousands of Americans who will benefit from the services provided in this band.

As a leader in the delivery of fixed BWA solutions using LTE technologies, Telrad believes strongly in the path to 5G. However, we also believe that other use cases provide substantial benefits to consumers, and that the CBRS band is poised to deliver those services. Rural broadband, municipal networks, smart grid, and other applications will all thrive when CBRS is commercially available. We are part of the overall ecosystem supporting these use cases, and we see tremendous opportunities in the United States to be a leader in all of them, not only 5G. Furthermore, CBRS has the potential to provide immediate benefit to Americans and our economy today.



Telrad is very concerned about the petitions for rulemaking that CTIA and T-Mobile filed in June, which are supported in the record almost entirely by the large mobile carriers and their large equipment suppliers. If the FCC changed the rules and auctioned Priority Access Licenses (PALs) for longer term licenses covering vastly larger areas such as Partial Economic Areas, many of our small customers will not be able to compete for licenses. Their business models do not support service of multi-county or multi-tract areas when their geographic market may be only a few square miles or a small town. Moreover, the equipment providers supporting this effort are the same who made it economically impossible for smaller wireless service providers to utilize LTE technology in the past. Telrad's launch of fixed-focused LTE in 2015 was the first solution in reach of rural broadband wireless service providers. This has been a major success, and has since created a market for LTE for small-businesses providing internet services to rural Americans. We agree with those statements in the record that the CTIA and T-Mobile petitions threaten these small businesses, the competition that they bring to the mobile industry, and the benefits that this competition provides to rural Americans.

The impact of the petitions is already being felt. First, as several in the record have explained, significant uncertainty has been created simply due to their filing. Our customers are evaluating the impact to their business if the requested changes are made to CBRS. This has the potential to curtail further investment and deployment, hurting our customers, and reducing competitive choices being delivered to Americans who deserve better. Second, Telrad must consider the impact on our business if our customers are unable to compete for PALs. This would limit our customers' ability to provide service, compete with mobile carriers, and ultimately change our focus in the U.S. While we applaud the FCC's desire to establish the U.S. as a global leader in 5G, we find it ironic that these actions would in fact damage the competitive market in the U.S. These actions will put the mobile carriers and a select few equipment vendors in the driver's seat, ultimately placing the profit of a few over the benefit of the American consumer and small business, and forcing companies like Telrad to reconsider the level of investment in the U.S. market. This is a serious concern that we urge the FCC to consider in this proceeding.

We join the overwhelming number of commenters in asking the FCC to reject the CTIA and T-Mobile petitions. If they are approved, our current investments and those of our customers would be placed in serious jeopardy. I have little doubt that the impact on fixed wireless service providers would be tremendous. Moreover, Telrad and other like equipment manufacturers would be required to re-evaluate their focus and investment in the U.S. market. This will have exactly the opposite effect that we believe the FCC and current administration would like to see, reducing the competitive choices and options available to rural Americans who have the right to affordable broadband internet services. We urge the FCC to retain its existing rules and move forward with the launch of this new CBRS band. This is the right thing to do for the fixed wireless internet service provider industry, equipment manufacturers who are investing heavily in this market, and the American consumer.

Please contact me if you have any questions. Thank you.

Respectfully submitted,

A handwritten signature in dark ink, appearing to read "Chris Daniels", with a long, sweeping horizontal line extending to the right.

Chris Daniels
Vice President and General Manager, North America
Telrad