

August 7, 2017



Marlene H. Dortch, Secretary
Federal Communications Commission
RE: Broadband Access Coalition 3.7 GHz Band Petition for Rulemaking (RM-11791)

To Whom It May Concern,

I am writing in reference to the petition filed by the Broadband Access Coalition regarding opening 3700 MHz to 4200 MHz to point-to-multipoint fixed wireless use. My companies, collectively known as Quantum Internet and Telephone, operate as a Competitive Local Exchange Carrier (CLEC) and Wireless Internet Service Provider (WISP) in central and northern Maryland. Our service territory encompasses urban areas, such as Baltimore City, as well as rural areas like northern Carroll, Baltimore, and Harford Counties. We are very much in favor of this petition, as it would have a very positive impact in our market.

We have recently been investing in next-generation wireless infrastructure, as our reliance on copper Unbundled Network Elements (UNEs) has not allowed us to keep pace with consumers' demand for bandwidth, and has limited the areas in which we can offer service. Additionally, Verizon has begun copper retirement in some of the areas we operate in, further necessitating the need to migrate our customers' Internet access and voice services to fixed wireless.

The 3.7 GHz band is very important to us, as it provides 500 MHz of new spectrum free from the interference in the 5 GHz and 2.4 GHz bands. In Baltimore City, interference limits channel size to 20 MHz or less, and it negatively impacts modulation rates, which effectively limits our low-cost point-to-multipoint service to only 30 Mbps of downstream bandwidth. With this new spectrum, we will be able to increase channel sizes to 80 MHz or more, easily bumping data rates to 1000 Mbps or more.

The 3.7 GHz band will also help us bridge the Digital Divide in Baltimore City. There is a lack of low-cost options for residential Internet access in Baltimore; however, the 3.7 GHz band has the potential to change this. Currently, the unlicensed bands used by local WISPs are subject to so much interference that they have essentially been rendered unusable. If the FCC chooses to open this band to fixed wireless, small, innovative companies such as Quantum will have the spectrum we need to offer a high-quality, yet low-cost, Internet access service to the citizens of Baltimore City.

We strongly support this petition. Without additional spectrum, companies like ours will have a difficult time meeting the Internet access needs of our fellow citizens. The Commission should move ahead quickly to issue a Notice of Proposed Rulemaking (NPRM).

Sincerely,

A handwritten signature in black ink, appearing to read "Kevin W. Brown". The signature is stylized with a large, sweeping "K" and a long, horizontal stroke extending to the right.

Kevin W. Brown, CEO

Quantum Internet Services, Inc. Quantum Telecommunications, Inc.

2975-B Manchester Road, Manchester, MD 21102

P: 410.239.6920 F: 410.239.0820 www.qis.net