

In the Matter of)
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The State of Fixed Broadband Competition) GN Docket No. 18-231

California Internet, L.P. DBA GeoLinks (“GeoLinks” or the “Company”) submits these comments on the Public Notice released by the Wireline Competition Bureau (“Bureau”) on July 27, 2018.¹

GeoLinks is proud to service the largest coverage area of any single fixed wireless Internet service provider in the state the California. The Company's fixed wireless technology platform depends on access to spectrum resources sufficient to support enterprise-level broadband connections. GeoLinks believes that the Commission's current spectrum allocation policies hinder fixed wireless providers from accessing spectrum resources, creating a barrier to market entry and competitive expansion in the fixed broadband marketplace. The Company urges the Commission to implement changes that will make access to spectrum and the ability to compete more attainable for fixed wireless providers.

In the Public Notice, the Bureau requests comment on “whether laws, regulations, regulatory practices or demonstrated marketplace practices pose a barrier to competitive entry into the fixed broadband marketplace, or to the competitive expansion of existing providers.”² GeoLinks believes that the Commission’s current practice for allocating spectrum licenses in certain bands creates a barrier to both competitive entry and competitive expansion for fixed

² Public Notice at 1.

wireless providers who rely on spectrum to provide service. The result is a landscape that favors certain technology types (i.e. fiber/cable-based fixed broadband providers) over others.

GeoLinks commends the Commission for its recent actions to review and possibly revise spectrum allocation policies in several bands and urges the Commission to ensure that new policies allow fixed wireless providers to compete on equal footing to other fixed broadband providers.

As an initial matter, with adequate spectrum resources, fixed wireless providers can – and do – deliver enterprise-grade connections that rival those of traditional, wired broadband providers. However, to date, access to dedicated spectrum resources has been difficult for fixed wireless broadband providers. While companies like GeoLinks have found ways to compete directly with incumbent and fiber-based service providers in some areas and can deliver gigabit and near gigabit connections, providing these connections via currently-available spectrum (which is generally limited to the use of unlicensed spectrum) in some areas can pose significant challenges.

In situations where only unlicensed spectrum is available, most connections are limited to point-to-point (“P2P”) connections over short distances to avoid interference with other users. Fixed wireless providers have had success with these P2P connections. However, as GeoLinks has explained, this is not a one-size-fits-all solution. First, even with extensive engineering and coordination, there is no guarantee that interference won’t occur at some point over unlicensed spectrum bands. This is especially true in densely populated, urban areas where there are numerous users in the unlicensed band. This interference can make it difficult and costly to engineer a dedicated link to a customer to ensure enterprise-grade broadband service – a service that a fixed wireless provider must offer to be competitive in urban markets. Second, P2P connections require expensive transmission equipment for each link (vs. one for multiple links). These costs can make it difficult for fixed wireless providers to competitively price broadband services, especially in residential markets where P2P equipment may be cost prohibitive for residential subscribers.

GeoLinks has advocated for the benefits of point-to-multipoint (“P2MP”) services in numerous filings before the Commission. This technology creates opportunities to connect multiple users in a more cost-effective manner (even if miles apart), making it ideal for serving multiple customers in one area at a lower cost. Despite the benefits of this technology, however,

current spectrum policies hinder fixed wireless providers' ability to take advantage of it. For example, P2MP connections are more susceptible to congestion and interference caused from extensive use of the unlicensed bands, especially in urban, highly-populated areas. This makes high-quality P2MP connections over unlicensed spectrum nearly impossible in some areas.

While several fixed wireless providers have realized success using unlicensed spectrum bands, GeoLinks urges the Commission to realize that competitive expansion within the broadband marketplace necessitates the ability for fixed wireless providers to do just that – expand. Continued limitation to unlicensed bands will only serve to hinder these providers' ability to compete with other fixed broadband providers. In order for fixed wireless providers to truly experience the same competitive opportunities available to other types of broadband providers, spectrum policy must be crafted in a way that allows fixed wireless providers the opportunity to obtain access to additional spectrum resources.

As noted above, GeoLinks commends the Commission for its recent actions to review its current spectrum policies. To ensure flexibility, the Company has made recommendations that spectrum be allocated under either a licensed, light-licensed or shared approach, depending on the band in question. The Company has also advocated that policies need to be developed in ways that avoid spectrum warehousing or favor one technology type over others. Specifically, GeoLinks urges the Commission to require robust build out benchmarks for spectrum licensees to ensure spectrum is fully utilized (including throughout the entire license area), create robust relinquishment, partition, and disaggregation processes for spectrum licensees that fail or wish not to meet benchmark requirements, develop spectrum auction procedures that allow smaller carriers the opportunity to compete for spectrum (such as the implementation of bidding credits), and avoid policies that favor certain technologies over others.

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III. CONCLUSION

Based on the foregoing, GeoLinks believes that the Commission's current spectrum allocation policies create a barrier to market entry and competitive expansion for fixed wireless broadband providers in the fixed broadband marketplace. GeoLinks urge the Commission to revise its policies in ways that allow fixed wireless broadband providers to access adequate spectrum to provide robust, high speed broadband services.

Respectfully submitted,

GEOLINKS, LLC

/s/ Skyler Ditchfield, Chief Executive Officer

/s/ Melissa Slawson, General Counsel/ V.P of Government
Affairs and Education

August 17, 2018