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Saint Cloud, FL 34769
Ph. (260) 622-5776
In U.S. (866) 317-2851

September 5, 2019

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

Re: ***Expanding Flexible Use of the 3.7 GHz Band
GN Docket No. 18-122
Ex Parte Communication***

Dear Ms. Dortch:

The Wireless Internet Service Providers Association (“WISPA”) provides notice of the enclosed letter sent yesterday to Members of Congress, Chairman Pai, and Commissioners O’Rielly, Carr, Rosenworcel and Starks signed by 232 WISPs, vendors and manufacturers headquartered in 43 states, the District of Columbia, Puerto Rico and the U.S. Virgin Islands explaining the importance of sharing satellite service C-band spectrum to deliver high-speed, fixed wireless broadband service to largely rural consumers.

Separately, 36 business owners from around the country have taken the time to write letters to the Commission explaining the severe limits on the spectrum they use to provide fixed wireless broadband, and why they need C-band spectrum to continue and expand service to their customers. WISPA has enclosed their stories with this letter.

The enclosed letters show that WISPs need shared access to C-band spectrum to be able to continue and expand their efforts to connect customers in underserved or even completely unserved areas with high-speed broadband, directly rebutting attempts by parties like CBA and SIA to argue that sharing C-band spectrum is unnecessary to bridge the digital divide.¹

For example, Reach4 serves 2,000 customers in Louisiana and states that it is “in desperate need of more spectrum to meet the increased demand for more bandwidth.”² Contrary to SIA and CBA’s assertions, Reach4 explains that it needs more spectrum because “we currently use ALL available unlicensed spectrum (900 MHz, 2.4 GHz and 5 GHz)” and that while 3.65-3.7

¹ See Comments of the Satellite Industry Association, GN Docket No. 18-122, RM-11791 and RM-11778 (filed Aug. 7, 2019) at 3 (“[T]here is no apparent reason explaining why they cannot use the same strategies and spectrum to satisfy any remaining unmet need for terrestrial fixed wireless access.”); Comments of the C-Band Alliance, GN Docket No. 18-122, RM-11791 and RM-11778 (filed Aug. 7, 2019) at 20 (“[C]laims that P2MP would prove a boon to rural broadband development are unsupported and overstated.”).

² Letter from Jay Domingue, Reach4, to Marlene H. Dortch, FCC Secretary (Aug. 23, 2019) at 1 (enclosed).



Letter to Marlene H. Dortch
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GHz has been useful, “with only 50 MHz of spectrum, there is a limit to how many customers you can service at the speeds they demand.”³ Similarly, Razzo Link serves 2,400 customers located almost entirely in rural areas in California, and explains that its use of 3.65-3.7 GHz has been limited by “rapid changes in the rules for this service and the fact that the increase[d] demand for bandwidth is outpacing the small amount” of spectrum available.⁴ Razzo Link further explains that WISPs have used up the available 5.4 and 5.7 GHz spectrum and that “home routers and other devices have eliminated the use of the 2.4 GHz spectrum and the local Electrical company has eliminated the use of the 900 MHz spectrum by utilizing it for their smart meters.”⁵ As for CBRS, Razzo Link’s situation is the same as that of most WISPs: “Based on our company size and financial status it is highly unlikely that we will be able to benefit from the CBRS Priority Access License.”⁶

These same basic facts of spectrum scarcity for fixed wireless are repeated by WISPs across the country. Rise Broadband from Colorado operates across 16 states, and explains that “[m]id-band choices today such as 3.65-3.7 GHz spectrum have already become severely congested” and while CBRS might help “there is no guarantee this too will not become quickly congested with PALs sold off to larger companies.”⁷ Total Highspeed from Missouri serves over 7,000 mainly rural customers in southwest Missouri, and states that “900 MHz, 2.4 GHz and 5 GHz are congested such that we are having difficulty meeting the demand for higher speeds” and that because it is using 3.65-3.7 GHz, expansion to C-band “would create a great opportunity to serve even more of the currently underserved or under-served in our service area.”⁸

³ *Id.*

⁴ Letter from Anthony J. Iacopi, CTO, Razzo Link, to Marlene H. Dortch, FCC Secretary (Aug. 23, 2019) at 1 (enclosed).

⁵ *Id.* at 2.

⁶ *Id.*

⁷ Letter from Jeff Kohler, Co-Founder & CDO, Rise Broadband, to Marlene H. Dortch, FCC Secretary (Aug. 27, 2019) at 1 (enclosed).

⁸ Letter from Travis Allen, Owner & CEO, Total Highspeed to Marlene H. Dortch, FCC Secretary at 1 (enclosed).



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Letter to Marlene H. Dortch
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Please take the time to review the stories of these business owners who have made investments in rural and other underserved communities, and who want to invest more to increase their speed and coverage. As these stories show, sharing C-band between satellite service and fixed wireless broadband service is the best and fastest way to address the broadband divide in the United States so that rural consumers can enjoy the same benefits as their urban counterparts.

Respectfully submitted,

/s/ Louis Peraertz

Louis Peraertz, Vice President of Policy

cc: Aaron Goldberger
Erin McGrath
Will Adams
Umair Javed
Bill Davenport



September 4, 2019

Chairman Wicker
Chairman Thune
Chairman Pallone
Chairman Doyle

Ranking Member Cantwell
Ranking Member Schatz
Ranking Member Walden
Ranking Member Latta

CC: FCC Chairman Pai
FCC Commissioner O'Rielly
FCC Commissioner Carr
FCC Commissioner Rosenworcel
FCC Commissioner Starks
Members of the Senate Commerce Committee
Members of the House Energy and Commerce Committee

Dear Chairman Wicker, Chairman Thune, Chairman Pallone, Chairman Doyle, Ranking Member Cantwell, Ranking Member Schatz, Ranking Member Walden, and Ranking Member Latta:

As the wireless internet service providers (WISPs), vendors, and manufacturers that make up the rapidly growing fixed wireless industry, we write to urge you to make critical C-band spectrum available for shared use so our industry can deliver gigabit speed internet to unserved and underserved Americans. Doing so would allow WISPs to play an immediate and powerful role in reducing the rural-urban digital divide, while also providing spectrum for the deployment of next generation mobile services, such as 5G.

The digital divide is a persistent challenge which marginalizes Americans by thwarting participation in our digital economy. Recent FCC statistics show that, though the divide is closing (albeit stubbornly), nearly 20 million rural Americans do not have access to FCC-benchmarked broadband services.

WISPs use a mix of licensed, lightly-licensed and unlicensed spectrum to deliver high-speed, fixed wireless broadband services to six million, largely rural customers in areas left behind by the largest telecom corporations. Spectrum enables WISPs to deliver access to far-flung, sparsely populated communities at about 1/7th the cost of doing that with fiber. Moreover, this can often be done almost overnight.

One such swath of sought-after mid-band spectrum is the C-band. It represents a 500 MHz, greenfield opportunity for the wireless ecosystem to gain access to spectrum which can carry tremendous amounts

of data over varying terrain. Current FCC rules, however, provide “full band, full arc” protection from interference for the satellite industry and its earth stations operating in the band, resulting in a gross underutilization of that resource.

A leading proposal that we favor calls on the FCC to clear 200 MHz of that spectrum for auction to mobile carriers, with the proceeds going to the U.S. Treasury. The remaining 300 MHz would then require coordinated sharing between satellite earth stations and fixed wireless providers.

As you know, Congress has also engaged on this matter, with prominent proposals instructing the FCC to auction off hundreds-of-megahertz of spectrum ostensibly for 5G use. Though we support the rapid development of next generation, 5G mobile broadband services, we harbor concerns about how that would be done. Because there are no clear directives to employ specific sharing requirements, this could be interpreted as constricting the FCC to an “auction-only” approach of allocating the C-band for commercial use. We believe such an approach would greatly limit meaningful access to that valuable spectrum for our companies, consequently exacerbating the digital divide.

An “auction-and-sharing” approach akin to what the FCC is considering would allow mobile wireless carriers to get the spectrum they need to build new 5G networks, while simultaneously enabling access to a portion of that spectrum for small, rural fixed wireless providers. The result – Instead of waiting for broadband to reach the hinterlands via the four national carriers, virtually overnight communities that didn’t have broadband access would see gigabit service for their farms, businesses and public institutions from their local, small fixed wireless providers already in the marketplace.

Accordingly, we urge you to include sharing in any spectrum related policy because we believe that, when combined with auctioning of that spectrum, it can more quickly and effectively close the digital divide.

Respectfully,

Irby Utilities	AK
SPITwSPOTS, Inc.	AK
3PLAi	AL
BLOUNTBROADBAND, LLC	AL
Conexus Communications, Inc.	AL
Twin State Wireless, LLC	AL
Aristotle Unified Communications	AR
Perfect Vision	AR
Windstream Services, LLC	AR
Wireless Etc.	AR
AIRFIBER WISP, LLC	AZ
Beka Business Media	AZ
Bolt Internet, Inc.	AZ
Desert inet, LLC	AZ
Simply Bits	AZ

TREPIC Networks, LLC	AZ
Webhiway Communications, LLC	AZ
Advanced Wireless	CA
Cal.net, Inc.	CA
Calpine Communications, LLC dba CalpineWireless	CA
Complete Computers	CA
Conifer Communications, Inc.	CA
Cruzio Internet	CA
Exwire, Inc.	CA
Fire2Wire	CA
FractalVision Technology Services, Inc.	CA
OACYS Technology	CA
OceanWiFi	CA
Ranch Wifi, LLC	CA
Razzo Link, Inc.	CA
Red Shift Internet Services	CA
Sail Internet	CA
SmarterBroadband, Inc.	CA
Tekify Fiber & Wireless	CA
unWired Broadband, Inc.	CA
Volt Broadband	CA
WiLogic, Inc.	CA
Wilson Creek Communications	CA
Zeta Broadband, Inc.	CA
Aerux Broadband	CO
Grand County Internet Services, Inc.	CO
Rise Broadband	CO
Slopeside Internet, LLC	CO
Verso Networks	CO
Zirkel Wireless	CO
DC Access, LLC	DC
Fire4 Systems, Inc.	FL
Hana Wireless	FL
Rapid Systems	FL
SJP Network Solutions, LLC	FL
SKYNET360, LLC	FL
Snappy Internet & Telecom	FL
Brightlan, LLC	GA
Highspeed Country Internet, LLC	GA
Hub Electronics, Inc. d/b/a Kloud Konnect	GA
Olancho Net S de R L	Honduras
BigGig Iowa, LLC	IA
BTWI Wireless Internet, LLC	IA
Howard's HighSpeed, Inc.	IA
Scott Technologies & Telecom, Inc.	IA

The Community Agency	IA
Intermax Networks	ID
Safelink Internet, LLC	ID
Blast Communications, Inc.	IL
Bspeedy Wireless, Inc.	IL
Internet of Things America, LLC	IL
New Wave Net	IL
Rising Wireless, Inc.	IL
Sonic Spectrum, Inc.	IL
theWISP.net	IL
Wisper ISP, Inc.	IL
Fourway.Net	IN
Fullnet, Inc.	IN
Joink, LLC	IN
New Lisbon Broadband & Communication	IN
On-Ramp Indiana, Inc.	IN
Portative Technologies	IN
Precision Data Solutions, LLC	IN
Skyewaves, LLC	IN
Surf Air Wireless, LLC	IN
Coffeyville Connection	KS
Skylink Wireless Internet, LLC	KS
XACT COMMUNICATIONS	KY
3P	LA
Computer Sales & Services	LA
FulAir, LLC.	LA
REACH4 Communications	LA
XStream Communications	LA
Fairspectrum, LLC	MA
NETBLAZR, Inc.	MA
RTO Wireless, LLC	MA
TCC Networks Inc.	MA
Freedom Broadband	MD
Rapid Broadband, Inc.	MD
Telegia Communications, Inc.	MD
Aroostook Technologies, Inc.	ME
TK Networks, LLC	ME
186networks	MI
A+ Communications	MI
Aspen Wireless Technologies, Inc.	MI
CMS Internet, LLC	MI
DMCI Broadband, LLC	MI
GogebicRange.net, LLC	MI
Michwave Technologies, Inc.	MI
Racc Enterprises, LLC	MI

Stratos Networks	MI
Summit Digital	MI
Advantenon, Inc.	MN
Broadband Corp	MN
Minnesota WiFi	MN
Alsat Wireless	MO
Click Computers, Inc.	MO
Isotech Inc / KCCoyote, Inc.	MO
MCM Systems	MO
WON Communications	MO
Newbreak Communications	MS
Gallatin Wireless Internet dba WISPPWest.net	MT
MontanaSky Networks, Inc.	MT
Open Broadband, LLC	NC
RidgeComms	NC
Affordable Internet Solutions	NE
Big Red Communications	NE
Future Wireless Technologies of Nebraska	NE
Sandhills Wireless, LLC	NE
Scott Bornemeier, LLC	NE
Skywave Wireless, Inc.	NE
Superior iNET	NE
Vistabeam	NE
Single Digits	NH
Alliance Communications Cables, Inc.	NJ
Fast Wave Networks	NJ
Lobo Internet Services, Ltd.	NM
Mimbres Communications	NM
NMSURF	NM
Athermal, LLC	NV
LTD Broadband, LLC	NV
Roller Network, LLC	NV
Stimulus Technologies	NV
Hudson Valley Wireless	NY
Nsys Wireless, LLC	NY
Rooftop Data, LLC	NY
Avolve	OH
Byhalia.net, LLC	OH
Clifton Communications, LLC	OH
Elevated Networks, LLC	OH
Jenco Wireless, LLC	OH
MetaLINK Technologies, Inc.	OH
Northwest Ohio Broadband, LLC	OH
Precision Tecknology	OH
southern ohio communication services, Inc.	OH

Watch Communications	OH
@Link Services, LLC	OK
AirLink Internet Services	OK
Arbuckle Communications	OK
Leonard Conn	OK
Midwest Technology, Inc.	OK
Pinged Networks, Inc.	OK
BLiNQ Networks	ON
Eastern Oregon Net, Inc.	OR
FireServe, LLC	OR
McMinnville Access Company	OR
MiWave	OR
Mosier WiNet, LLC	OR
The Greater Eastern Oregon Network, LLC	OR
BackWoods Wireless	PA
Double Dog Communications	PA
FAYETTE HOLDINGS LIMITED	PA
ICON Technologies, Inc.	PA
In the Stix Broadband	PA
PennWisp, LLC	PA
Xtreme Enterprises, LLC	PA
Aeronet Wireless Broadband, LLC	PR
COSOTNET Wireless Broadband	PR
VPNet, Inc.	PR
BizVox Communications	SC
Celerity Broadband, LLC	SD
Celerity Networks, LLC	SD
Crossroads Wifi	TN
4ip Technology and Media, LLC dba Nexstream	TX
Adair Winter	TX
Amarillo Wireless / AW Broadband	TX
Baicells Technologies	TX
Brazos WiFi	TX
CAJTEX Communications, LLC	TX
CellTex Networks, LLC	TX
Cirra Networks	TX
EBTX Wireless, LLC	TX
Farm to Market Broadband, LP	TX
Hill Country Broadband, Inc.	TX
Holy Wireless	TX
Hyper Fusion, LLC	TX
Internet Management Services, Inc.	TX
Metroplex Communications, Inc.	TX
Nexgenwisp, LLC	TX
Nextlink Internet, LLC	TX

Plains Internet	TX
Rural Texas Broadband, Inc.	TX
SignalNet Broadband	TX
simplefiber communications	TX
Skynet Country, LLC	TX
SmartBurst, LLC	TX
SOS Communications	TX
Stephen M. Lash	TX
Texoma Communications, LLC	TX
TISD.net	TX
VRFuturenet	TX
Wireless internet corporation	TX
AWI Networks	UT
Blue Spring Broadband	UT
InfoWest, Inc.	UT
River Canyon Wireless	UT
SourceOne Internet	UT
AcelaNet, LLC	VA
All Points Broadband	VA
Eastern Shore Communications	VA
Wolfe Ventures, Inc.	VA
Broadband VI	USVI
360 Communications, LLC	WA
Advanced Internet	WA
CresComm WiFi, LLC.	WA
Desert Winds Wireless	WA
Methownet.com	WA
NCI Datacom	WA
Ptera, Inc.	WA
Rodeo Networks	WA
Wired or Wireless, Inc.	WA
Bayfield Wireless	WI
Country Wireless	WI
e-vergent.com, LLC	WI
Ethoplex, LLC	WI
Excel.Net, Inc.	WI
NGL Connection	WY

AcelaNet, LLC

August 30, 2019

Marlene H. Dortch
FCC Secretary
445 12th Street, NW
Washington, DC 20554

Dear Marlene,

AcelaNet provides fixed wireless service in 14 rural counties in Virginia to residents, businesses, healthcare providers and schools. The company is continuing its plan to expand to more under serviced markets. Most of these rural areas have very little if any broadband service. Some underserved areas do have services that offer very limited satellite and slow DSL services that do not meet current broadband needs. The company's goal is to provide true high-speed internet that exceeds the needs of residents, schools, healthcare providers and businesses. As customers do more video streaming for education, business and entertainment the demand for faster speeds grows, so the network is being built to meet future demand. The key limiting factor in a fixed wireless network is the availability of frequencies.

For over a decade AcelaNet has used unlicensed frequencies but the unlicensed frequencies are becoming more congested and are limited in meeting the broadband speed required for current customer demand much less meeting future needs. Over the last few years AcelaNet has invested heavily in a 3.65 GHz LTE network that provides true high-speed internet. The network is built using company owned, local government and commercial cell towers. The narrow band in the 3.65 GHz limits expansion and limits speeds, thus the need to have a large bandwidth of frequencies. The current 3.65 GHz frequency similar to the 3.7 to 4.2 GHz which can provide the needed bandwidth to meet expanding service in current markets as well as expansion new markets giving users fast internet.

As a small business working to meet the needs in unserved and underserved markets, we have no guarantee that we will be able to use the CBRS Priority Access Licenses or acquire other mid-band spectrum at FCC auction. Shared C Band will allow our company to continue providing service to markets that are in desperate need for high-speed broadband service for education, healthcare, business and entertainment.

Regards,



Lon Whelchel
CEO
AcelaNet, LLC



604 Thomas Nelson Hwy.
Arrington, VA 22922
434-263-6363

Advanced WIRELESS



Hands-Free Car Kits

Video Surveillance



KENWOOD

August 26, 2019

Marlene H. Dortch
FCC Secretary
445 12th Street, NW
Washington, DC 20554

Ref: GN Docket No. 18-122, RM-11791, RM11778

Dear FCC:

It is our intent to utilize the C-band immediately if authorization is acquired. This would be used for High Speed Broadband access. Business users and Residential customers are in need and requesting higher speed plans. We would love to accommodate, but with existing frequencies, we have congestion.

Additional spectrum is needed to allow any broadband, and additional broadband for our geographic area. We are located on the central coast of California, Santa Barbara County, city of Santa Maria. We cover two counties, Santa Barbara and San Luis Obispo counties. We have approximately 500 customers, serving the rural parts of these counties, not the cities with plenty of cable options. But the farmers, vineyards, and rural businesses and homes need this.

Many hills and we are using 3.65 GHz equipment and the 3.7 to 4.2 GHz band will have similar propagation, which will be beneficial to these residents of this area. We have no guarantee to be able to use CBRS Priority Access Licenses or other mid-band spectrum at FCC auction. And this will be a very useable band to accomplish high speed broadband.

We currently use 5 GHz, 2.4 GHz, 900 MHz, and 3.65 GHz depending on locations. But spectrum is scarce to provide coverage expected by these customers. Why should the rural customer not get similar service to his/her more urban neighbor?

Please help us help these communities.

Best,



Dan Rudnick
President



Tel 787.273.4143 Fax 787.273.4145
18 Street 1 Suite 303 Guaynabo, PR 00968
www.aeronetpr.com

GN Docket No. 18-122, RM-11791, RM-11778

Marlene H. Dortch
FCC Secretary
445 12th Street, NW
Washington, DC 20554

Best regards,

We hope that upon receipt of this communication, you are well.

The company AeroNet Wireless Broadband, LLC, represented by its president Gino Villarini, is located in San Juan, Puerto Rico. AeroNet is a Hybrid Service Provider, and we utilize fiber and wireless technology to reach out customers. Over ninety percent (90%) of our customer base uses Fixed Wireless Access technology in the unlicensed bands. Our network currently serves over 9,000 customers in Puerto Rico, Vieques, Culebra, US Virgin Islands, and South Florida.

We intend to use C-band spectrum immediately to provide next-generation (over 100 Mbps) Broadband services in our markets using the 5G or similar fixed wireless technology.

It is in our interest to state the reasons why we are motivated to use deploying broadband service in the C-band:

1- Spectrum scarcity: With over 100 WISP's in Puerto Rico serving urban and rural areas, the current unlicensed spectrum is heavily occupied and unavailable to expand services. This challenge affects the companies that are seeking to improve and expand their service. With a new spectrum band consisting of up to 500 MHz, the opportunities expand vastly. Spectrum is the driver of the WISP Industry.

2- Most Puerto Rico rural areas are underserved and high-speed internet options above 50 Mbps are required for current and future development of its economy. This new technology would embrace those businesses that are outside the urban areas, where the service is available. By introducing more access options, the rural areas would have the same opportunity to see their business grow. Like business, residents of these rural areas can enjoy better online communication and more choices when it comes to having Internet service in their homes.

3- Huracan Maria demonstrated that fixed wireless technology was the quickest access technology to reestablish communications after a disaster. By expanding the available spectrum, the options for the immediate reestablishment of communications after a disaster broaden greatly. Most of the wireline infrastructure remains aerial and susceptible to damages after any disaster. The reestablishment of such infrastructure takes months, whereas fixed wireless technology is quicker to reestablish and deploy.



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4- Fixed wireless is a viable technology for an island like PR, with its topographical challenges that make the deployment of fiber, not cost-efficient. The mountainous characteristics of our island make it cost-prohibitive to expand fiber infrastructure into the rural and other underserved areas. By having more spectrum available for the Fixed Wireless Industry, more opportunities are opened for more operators to expand their services and provide ubiquitous coverage around the island.

We are confident that the FCC will evaluate this opportunity to the competitiveness of the industry and the services it provides along, allowing us to serve our community.

Sincerely,

Gino Villarini
President/Founder



August 26, 2019

Marlene H. Dortch, Secretary
Federal Communications Commission
GN Docket No. 18-122, RM-11791, RM-11778
445 12th Street, S.W.
Washington, D.C. 20554

Dear Ms. Dortch:

All Points Broadband provides fixed broadband services primarily in rural and semi-rural areas of Virginia, Maryland, and Kentucky, using a blend of fiber and fixed wireless access technologies. In many areas, our last mile is delivered over unlicensed spectrum (900 MHz, 2.4 GHz, 3.65 GHz and 5GHz). By opening the C-Band for coordinated shared use, as WISPA has suggested, we would be able to provide our customers with greater speeds, more capacity and improved reliability.

In July WISPA, Google and Microsoft filed a detailed co-channel coexistence study, which shows that earth stations typically can be protected outside of a 10 km radius. This would enable 78% of the country and more than 80 million Americans to receive fixed point to multipoint service that All Points and other companies use to deliver service to rural consumers.

In many areas where All Points operates, we lack sufficient unlicensed and CBRS spectrum to meet customer demand. If the FCC permits us to share C-band spectrum with earth stations, All Points will deploy high-speed fixed broadband service as quickly as possible to meet growing consumer demand. We understand that equipment already in use in the 3.65 GHz band can be easily adapted for use in the adjacent C-band, and that the coordination process can be initiated quickly and easily. With this additional spectrum, our customers – and consumers residing or working nearby our service area – will be able to access higher-speed broadband services that rival the speeds its urban counterparts often receive.

We support WISPA's request to clear a portion of the C-band for auctioned spectrum and to relocate earth stations to the upper portion of the band. We urge the Commission to permit coordinated sharing in the upper portion so that companies like All Points can continue to bridge the digital divide using private capital.

Sincerely,

/s/

James G. Carr
Chief Executive Officer



August 27, 2019

Marlene H. Dortch
FCC Secretary
445 12th Street, NW
Washington, DC 20554

To Whom It May Concern:

RE: GN Docket No. 18-122, RM-11791, RM-11778

I am writing on behalf of my company, Alsat Wireless regarding the proposed changes to the C- band spectrum.

We are a Wireless Internet Service Provider (WISP) based in Central Missouri, providing High Speed Internet services to 700+ customers in our service area. Our coverage area is primarily rural, where most of our customers have the choice of our services, potentially mobile internet services through their cell phone provider, or satellite.

We will use the C-band spectrum to provide fixed point-to-multipoint services if the band is made available for shared use. Our customer base is using more bandwidth every day, thus requiring more capacity. Other bands we use, including in the 2.4 GHz range and the 5.1 to 5.8 GHz range are becoming more congested, making it more difficult to meet the demands of our customers. These challenges are also felt as we look to expand to other currently unserved areas.

We are currently using equipment in the 3.65 GHz band and understand that the propagation characteristics are similar in the 3.7 to 4.2 GHz band. As we have no guarantee that we will be able to use CBRS Priority Access Licenses, nor will we be able to acquire other mid-band spectrum at FCC auction, this spectrum sharing plan is of the utmost importance to us as a service provider.

Thank you for your time and consideration. We look forward to a favorable outcome in this matter.

Sincerely,

Alan Luelf, General Manager
Alsat Wireless
145 Highway B
Montgomery City, MO 63361



**22690 Pemberville Road
Luckey, Ohio 43443
419-837-5015**

Aug 28, 2019

RE: GN Docket 18-122, RM-11791, RM-11778

Marlene H. Dortch
FCC Secretary
445 12th Street, NW
Washington, DC 20554

Amplex is an Internet Service Provider in northwest Ohio that provides service to over 8,000 customers in Wood, Ottawa, Sandusky, Seneca, Lucas, Hancock, and Erie county. Our primary method of delivering advanced broadband and voice services to our customers is using fixed wireless technology. We currently make extensive use of the unlicensed 5.1-5.8Ghz, 900Mhz, 2.4Ghz, and 3.65-3.7Ghz band to deliver service. Amplex will be converting a large number of the 3.65-3.7Ghz customer to CBR5 operation.

The increasing demands for advanced broadband as well as streaming media are straining our ability to deliver services in the available spectrum. The addition of C-Band spectrum between 3700-4200Mhz would be very useful in meeting demand for service. The FCC has an opportunity in the C-Band proceeding to take an extremely cost effective and timely step to improve access to broadband in America. By enabling coordinated sharing in the C-Band Amplex will be able to increase capacity, speeds, and the number of customers we can serve.

The C-Band, being located directly between our existing 3.65 and 5.7Ghz equipment, means equipment manufacturers can quickly and economically adapt existing equipment platforms for this band. Utilization of C-Band spectrum to deliver broadband will happen very quickly – assuming the FCC makes the spectrum available.

The mobile carriers will tell you that they are going to solve the rural broadband problem and need this spectrum all to themselves - as they do in every spectrum proceeding. The mobile carriers will tell the FCC that they care about rural broadband, right up to the point the FCC sells them the spectrum and they promptly ignore rural America once again. Today's news headlines following the FCC's recommended approval of the merger between Sprint and T-Mobile based on promises to build rural broadband was entirely predictable: "T-Mobile cancels 5G upgrades and new builds nationwide, possibly crippling some contractors" ¹. Amplex has a long track record of effectively using spectrum to provide broadband in rural areas. The C-Band spectrum will be put to use quickly and for exactly the purpose the FCC intends – rural broadband – if the FCC makes wise choices with this spectrum.

The FCC has a very rare opportunity to greatly improve rural broadband by permitting shared use in the C-Band. By allowing sharing in the C-Band the FCC will be making the correct choice.

Sincerely,

Mark Radabaugh
President
Amplex Electric, Inc.

¹ <https://wirelessestimator.com/articles/2019/t-mobile-cancels-5g-upgrades-and-new-builds-nationwide-possibly-crippling-some-contractors/>



August 28, 2019

Marlene H. Dortch
FCC Secretary
445 12th Street NW
Washington, DC 20554

Reference: GN Docket No. 18-122, RM-11791, RM-11778

Dear Ms. Dortch,

My name is Tim Wright, I represent Bertram Communications LLC as the Vice President of Operations. Bertram Communications LLC is a wireless internet service provider delivering high-speed, broadband internet to a significant portion of rural Wisconsin. Our 7000+ customers are made up of families, farms, businesses, schools, and entire towns and neighborhoods that cannot or have not been served by traditional internet service providers due to geography, demographics, and cost. We serve them all wirelessly.

We wanted the FCC to know that we intend to use C-band spectrum immediately to provide high-speed, fixed point-to-multipoint service if made available for shared use. The current frequencies we use of 900, 2.4, 3.65, 5.1, 5.2 and 5.7 have become congested. We are having difficulty keeping up with the growing demand or being able to offer higher speeds.

We would also like to expand our service availability into unserved and underserved areas in rural Wisconsin to provide these communities with high-speed internet which we feel is no longer a luxury item but a necessity in everyday life. We feel so strongly about this, that we are writing to urge you to allow us the use of C-band spectrum for coordinated shared use in providing high-speed rural broadband deployment. If this C-band is not shared, the residents of rural Wisconsin will suffer.

I want to thank you for your consideration and look forward to hearing from you soon.

Sincerely,

Tim Wright
Vice President of Operations
Bertram Wireless
Bertram Communications LLC
300 Industrial Drive
Random Lake, WI 53075



August 30, 2019

Concerning FCC Proceedings: 18-122, RM-11791, RM-11778

To: Chief, Wireless Telecommunications Bureau

We are a wireless internet service provider based in Prescott, AZ. Our coverage area is most of Yavapai County, AZ, which consists of 8,128 square miles. We have more than 1200+ subscribers in this area that range from 3 Mbps to 90 Mbps. Our coverage area consists mainly of small towns fewer than 50,000 people. These towns have DSL, cable, satellite, and cell providers. Most of these providers have extensive holes in their service coverage. This is where we are concentrating our efforts to bring quality internet service to those who are under served.

Bolt Internet Inc. received its NN license in May of 2011. Since that time, we have invested heavily in Part 90 equipment and have now started installing Part 96 equipment. We are currently at nearly 20 percent of our customers in the CBRS Band. So an increase in channel space that this equipment can use will allow us to provide for more rural customers at higher speeds. We also heavily are using the 5ghz and are looking to deploy in the 900mhz and the TVWS band in the near future.

Unfortunately, the 2.4 ghz band is useless in this area due to home routers and other home style devices. We are now seeing those same issues in the 5ghz band so we need more dedicated frequency to provide fixed wireless internet to our customers. I have

seen a lot of buy in with other Wisps into CBRS and a lot of investment made buy the smaller providers like us. So, I feel it is in all people's best interests to reward the little guys with some cheese and add parts of the C-band to this shared system, and sit back, and watch us do our magic and build the networks to the rural areas to help the underserved. We will use this new frequency to further expand to the more rural areas of the great state of Arizona.

With this letter Bolt Internet Inc. demonstrates its support of WISPA to quickly open the C-band to a shared system. This should help provide us with faster plans and better coverage while still giving the reliability that our customers require of us.

Sincerely,

Robert W. Clark
President
(928)717-2658



August 28, 2019

Marlene H. Dortch
FCC Secretary
445 12th Street, NC
Washington, DC 20554

RE: GN Docket No. 18-122, RM-11791, RM-11778

Dear Secretary Dortch:

CloudWyze is a WISP dedicated to the delivery of high-speed broadband to the under-served communities of North Carolina. Based in Wilmington North Carolina, we've built a solid reputation for delivery of multiple services to the community including fixed wireless internet packages.

Since 2018, we've been awarded contracts to serve two critically underserved (Tier 1) NC counties through separate government agencies and are aggressively working to deploy services to the communities where the larger carriers have neglected and will not build out their networks.

Our network services are designed around access through fixed point-to-multipoint high-speed broadband using the C band spectrum and depend on its availability through shared use. The only viable technology for these communities is the C-band which provides the support of high-speed broadband along with NLOS (non-line of sight) capabilities. Other bands have severe limitations including congestion or poor performance in rural areas. Currently we are using 3.65 GHz equipment with good success and require growth options with similar propagation characteristics which we understand the 3.7-4.2 GHz band can provide.

Loss of reliable access to the spectrum will have major impact on our ability to provide wide scale services to these under-served communities. We encourage you to adopt a plan which provides for coordinated sharing in the upper 300 MHz of the 3.7-4.2 GHz band among earth stations and point-to-multipoint operations.

Respectfully,

A handwritten signature in black ink, appearing to read 'Shaun Olsen', written over a circular blue ink stamp.

Shaun Olsen
President | CEO
CloudWyze, Inc.



720 N 3rd Street #402
Wilmington | NC | 28401

www.cloudwyze.com



August 28th, 2019

Reference Docket No. 18-122, RM-11791, RM-11778

Marlene H. Dortch
FCC Secretary
445 12th Street, NW
Washington, DC 20554

Dear Mrs. Dortch,

Our company, Columbia iConnect is located in the small rural town called Walla Walla Washington. We currently have many customers in and around a four-county radius. As a WISP provider we are currently growing and trying to keep up with the customer demand for more bandwidth at lower costs. We need the ability to provide greater bandwidth to our growing customer base as well as meeting the requirements of higher bandwidth planned in the future.

The areas we cover here are mainly rural farmland and small communities which do not have access to traditional internet options. Over the year's frequencies like the 900 Mhz, 2.4GHz and the 5GHz band have become over-used, congested and make it very difficult to provide the services to our existing as well as future customers. Having the C-band spectrum will enable us to provide better quality internet and keep up with the high demand for more bandwidth. We currently have several locations where having the C-band available to us will greatly impact our business and our customers in a positive way. In the areas we currently serve there are other WISP providers. With those providers and other companies that use frequency equipment it creates a lot of interference and all-around poor service in most frequency bands that have overuse or limited resources.

We currently use the 3.65GHz equipment in areas and understand the propagation characteristics that are like those of the 3.7 to 4.2 GHz band. In using the 3.65GHz we have been able to provide great service to customers but unfortunately, we have no guarantee that we will be able to use the CBRS Priority Access Licenses or even be able to acquire other mid band spectrums at the FCC auctions. If we do not have access to relatively clean frequencies, it will likely cause our business to drop and run a risk of customer loss due to not being able to keep up with customer demands.

In closing we want you to know that by opening the C-band spectrum for our company and others will be very beneficial not to just the companies but to the people receiving the service. These days schools require parents to have internet at home for their kids to conduct their schoolwork, and people are working more from home and not in the traditional office. We feel very strongly about providing everyone superior service. The only way to achieve this would be to have access to the C-band spectrum that companies like ours can afford.

Thank you for your time and we hope you take this into consideration as you make decisions for our future.

Sincerely,

A handwritten signature in blue ink, appearing to read "Robert Greene", is written over a horizontal line.

Robert Greene
Manager of Communications and Information Technology

.....

48881 SR 112
P. O. Box 968
Port Angeles, WA 98362-0167
(360) 928-0000, Billing and Sales
(800) 562-0036, Toll Free
(360) 928-1044, Fax

CresComm WiFi, LLC

8/24/2019

RE: GN Docket No. 18-122, RM-11791, RM-11778

Marlene H. Dortch
FCC Secretary
445 12th Street, NW
Washington, DC 20554

Hello;

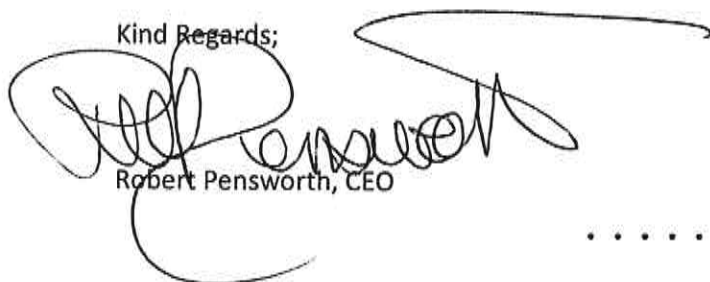
CresComm WiFi, LLC is a Fixed Wireless Broadband provider in Port Angeles, Forks, Bay Center and Chinook in Washington State. We have 220 customers that are mainly rural residential and some business/govt. types.

We intend to use C-band spectrum immediately once available to provide high-speed, fixed point to multipoint service.

The reasons we want to use C-Band are:

- Consumers are using more and more bandwidth and/or require more capacity;
- 5.1 – 5.8 GHz bands are congested such that you are having difficulty meeting demand, offering higher speeds, etc.;
- We want to expand service to other areas that are unserved or underserved, or you want to provide better competition and choice to the community;
- We have no guarantee that you will be able to use CBRS Priority Access Licenses or acquire other mid-band spectrum at FCC auction due to the cost.

Kind Regards;



Robert Pensworth, CEO

.....



28150 N. Alma School Pkwy #103-294
Scottsdale, AZ 85262

Marlene H. Dortch
FCC Secretary
445 12th Street, NW
Washington, DC 20554

Re: GN Docket No. 18-122, RM-11791, RM-11778

Ms. Dortch,

I am the owner of Desert iNET, LLC. We are a WISP serving more than 3,000 customers in the rural areas north of Phoenix, Arizona.

We currently utilize the unlicensed 5 GHz band as well as 3.6 GHz to serve our customers. These bands are highly congested or too small, and are keeping us from offering the speeds that our customers need.

WE NEED ADDITIONAL SPECTRUM. Adequate spectrum in C Band would help us meet the demand and speeds our customers are demanding.

FREEING UP THE C BAND IS CRITICAL FOR US TO OFFER NEEDED SERVICE SPEEDS TO OUR RURAL CONSUMERS.

Thank you for your assistance!

Regards,

A handwritten signature in black ink, appearing to read "Jeff Hardesty", with a stylized flourish at the end.

Jeff Hardesty, owner
Desert inet, LLC
480 248-0006



e-vergent

8330 Corporate Drive
Mount Pleasant, WI. 53406
262-884-2040

Marlene H. Dortch
FCC Secretary
445 12th Street, NW
Washington, DC 20554

Reference: GN Docket No. 18-122, RM-11791, RM-11778

My company, e-vergent.com, LLC, is a fixed wireless internet service provider in NE Illinois and SE Wisconsin. We provide service to over 3000 residential and business customers. Our network covers a diverse customer base. We provide high bandwidth service level agreement backed Internet service to companies in business parks near Chicago's O'hare airport. We also provide rural residential service to low population density farmland areas with gravel roads only 40 miles west of O'hare International Airport. Finally we provide service in semi rural areas in Wisconsin.

Common to all of these geographic areas and customer niches is that they demand 100% uptime and bandwidth usage is on a continual rise. 5GHz has been our workhorse through the years. In the more populated areas, such as suburban Chicago business parks, it has become difficult to keep links running for high uptime business services in 5GHz. We have looked at 60GHz, 24GHz and part 101 links but we really need a high capacity multipoint band because dedicated antennas on towers is not sustainable and cost effective and 60GHz's range is too short. In the rural areas we use 3GHz for non line of sight service. Non line of sight rural residential service is an untapped avenue of growth as line of sight 5GHz service has left many people in our coverage area without service. We have watched the 3.65GHz band and transition to CBRS. Due to our location we are not convinced we'll be able to obtain a CBRS PAL or other mid-band spectrum in channel sizes large enough to provide enough bandwidth in the long run.

25/3 service was a good benchmark in 2015 for broadband. I also believe that demand is ever increasing and we are looking at building our network to support bandwidth per the following schedule, a 21% year over year growth rate.

2015	2019	2023	2027
25Mbps	54Mbps	115Mbps	246Mbps

I believe the above numbers should be a minimum plan but currently 50Mbps is a maximum plan in many areas for us. Currently we sell a 10/1 service to NLOS customers due to the capability of the gear and link conditions using a 10MHz channel size in NLOS conditions. Our support staff can attest that 10/1 service is simply not enough to meet today's demand much less in the future and we want to build a network with the future in mind.

Our company has been providing broadband since 2001 and our sister company provided dialup internet service since 1995. We currently have a 4.4 out of 5 rating with 106 reviews on Facebook and 4.5 out of 5 rating with 122 reviews on Google. Broadbandnow.com rated us a top 3 fastest fixed wireless ISP in Illinois in 2019. We have been pushing our network to provide the best service possible. We know the area and we're committed to our customers and general service area. We know exactly where to deploy new technology and spectrum bands as soon as they are available to provide service to more people. We need the additional spectrum to augment our existing network to simply keep up with a data hungry customer base. We need the spectrum to offer 250Mbps service on the low end and 1Gbps on the high end. We stand ready to deploy C-Band/3.7GHz to 4.2GHz spectrum, should it become available to us.

Respectfully

Joseph Falaschi
Managing Member
E-vergent.com, LLC.



2103 Indiana Avenue
Phone: (920) 452-0455 or (888) 489-9995

Sheboygan, WI 53081
Fax: (920) 452-8118

August 29, 2019

Marlene H. Dortch
FCC Secretary
445 12th Street, NW
Washington, DC 20554

RE: GN Docket No. 18-122, RM-11791, RM-11778

Dear FCC Secretary:

We are writing this letter to address our concern for the C-band spectrum and the ability to provide fixed point-to-multipoint access for our company. Excel.Net is a local Wireless Internet Service Provider with our offices located in Sheboygan, Wisconsin. We service a large area in the southeastern part of the state and current coverage can be seen from our web site at <https://www.excel.net/services/wireless>. This is always kept up to date for potential new subscribers. Much of the area we service are small rural communities which need the ability to have access to high speed wireless service to remain viable in the current economy.

As we are all aware the need for greater and greater capacity and speed is the norm. Applications keep pushing these needs and it is critical that we be able to meet them going forward for our customers and their businesses. The current bands that we have access to in 2.4 GHz / 5 GHz are just getting too saturated or do not have the spectrum available to meet these growing needs. The C-band spectrum will certainly allow us to continue to meet needs going forward and is critical to the Internet infrastructure in the United States!

This band and the characteristics of the hardware that will support this band will allow us to provide the needs going forward, but equally as important reach additional subscribers that currently are either unserved by broadband options or underserved with limited choice. There are a number of WISP's like ourselves that **NEED** this band to continue moving Internet forward for all. The proposed auctions for CBRS Priority Access Licenses may well be out of our reach and only available to the larger tier 1 carriers that can purchase them. This then leaves the highly likely situation that these bands will be either unused or underused in providing the much-needed coverage that they could if WISP's like us are allowed access to them.

We would ask that all efforts be made to allow these bands the greatest flexibility and open use possible so that we are able to implement equipment using them and service customers in the way they demand these days!

Excellent Internet

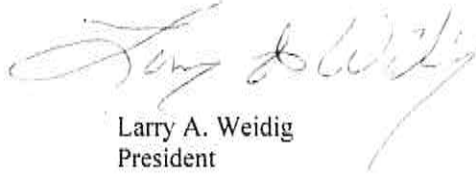
.....

August 29, 2019

Page 2

Thank you for taking the time to review this request and consider the impact that decisions will have going forward. If you require any additional information or clarification on any of the items discussed please feel free to contact me. I can be reached by e-mail to lweidig@excel.net or through our phone system at (920) 452-0455.

Sincerely,

A handwritten signature in dark ink, appearing to read "Larry A. Weidig", written in a cursive style.

Larry A. Weidig
President

Fourway Computer Products, Inc.
51061 S.R. 933 North
South Bend, IN 46637
574-277-7720
Rhouin@fourway.net

August 27, 2019

To:

Marlene H. Dortch
FCC Secretary
445 12th Street, NW
Washington, DC 20554

Re: GN Docket No. 18-122, RM-11791, RM-11778

Fourway.Net provides internet connections to more than 5000 customers in north central Indiana. We primarily service customers who have few if any other high-speed internet options.

We are committed to providing the internet connectivity that our customers and neighbors require.

We have been utilizing the 3.65GHz spectrum to make that possible. We provide internet connections up to 25Mb using this spectrum and associated equipment. We currently have more than 120 network sites (towers) that are used to deliver the bandwidth our customers need.

We continue to work to deliver the increasing capacity our customers require. It is increasingly challenging to meet these demands with current spectrum availability.

We expect that the new rules in the CBRS band will help to some degree. We do expect that our access to spectrum in the band will be heavily restricted. Most expect that the upcoming PAL auction will likely result in most of the CBRS band being unavailable to us.

We intend to utilize the C-band spectrum for fixed point-to-multipoint service if it is available. The 3.7GHz-4.2GHz band would provide similar propagation characteristics. This band would also allow us to use much of the same equipment to add the coverage and capacity needed for the future.

Since we would be able to utilize the same transmitter equipment, it would be more economical to deliver the bandwidth the future requires. This deployment could happen quite quickly, since most of the infrastructure is already there.

Thank you for your consideration

Roland Houin

A handwritten signature in black ink that reads "Roland Houin".

President, Fourway.Net



251 CAMARILLO RANCH RD. CAMARILLO, CA 93012 | (888) 225-1571 | WWW.GEOLINKS.COM

August 30, 2019

Marlene H. Dortch
FCC Secretary
445 12th Street, NW
Washington, DC 20554

**Re: Planned Use of C-Band Spectrum
GN Docket No. 18-122, RM-11791, RM-11778**

Dear Ms. Dortch,

California Internet, L.P. dba GeoLinks (“GeoLinks” or the “Company”) hereby submits this letter to provide information pertinent to the Company’s planned use spectrum in the 3.7-4.2 GHz Band (the “C-Band”) to provide high-speed broadband should such resources become available.

Millions of Americans lack what is considered, by today’s standards, highspeed broadband access - especially in rural areas. Sparsely populated rural areas are not well suited for traditional, wired broadband service given the cost to build and deliver a cable/ fiber-based network, often resulting in these areas being left on the wrong side of the digital divide. However, fixed wireless broadband technology can provide highspeed broadband to consumers in these areas for a fraction of the cost of traditional, wired networks. In addition, fixed wireless providers can (and do) offer competitive choice to consumers in urban and suburban areas.

Like other fixed wireless providers, GeoLinks’ technology platform depends on access to spectrum resources sufficient to support high-speed broadband connections. GeoLinks believes the C-Band offers an opportunity for the Commission to allocate spectrum resources in a way that will promote competition and help bridge the digital divide while protecting current users of the band. For these reasons, GeoLinks has long supported the idea of shared use in the C-Band and believes that it will promote the rapid deployment of Point-to-Multipoint (“P2MP”) services.

Should the C-Band become available for shared use, GeoLinks intends to use the band to provide fixed P2MP service and to do so as quickly as possible. The C-Band spectrum has a number of characteristics that make it well suited for the provision of high-speed broadband

services including good range of transmission that can support high-speed, high-capacity broadband access plans. In addition, C-Band-compatible hardware is currently available and reasonably priced to allow small to mid-sized carriers to take advantage of it. Moreover, because the spectrum does not require large antennas/ receivers, it makes the use of the C-Band optimal for residential and small business broadband service applications.

GeoLinks continues to urge the Commission to make C-Band spectrum available for shared P2MP services. The Company believes that such shared use will encourage the rapid deployment of high-speed broadband services in rural areas.

Respectfully submitted,

CALIFORNIA INTERNET, L.P. dba GEOLINKS

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



222 N 2ND ST.
HAMILTON, MONTANA 59840
(406) 363-2183



Marlene H. Dortch
FCC Secretary
445 12th Street, NW
Washington, DC 20554

Dear Ms. Dortch,

Cybernet1 has been in business for over 20 years providing broadband internet service in the Bitterroot and Missoula Valleys of Western Montana. We currently provide service to over 3700 customers.

The changing and ever growing landscape of unlicensed spectrum has created a growing issue in our coverage area. With any technology manufacturer able to produce a product in unlicensed spectrum, it has created an enormous amount of interference to deal with in providing reliable fast broadband service to our customers. Opening up additional spectrum in the 3.7 to 4.2 Ghz bands that can be used by fixed wireless operators under a lightly licensed approach would greatly improve our abilities to keep a very reliable connection and not have to worry about the off the shelf security camera systems, baby monitors, or any other system that creates interference in the unlicensed bands.

I encourage the FCC to see the over 2000 WISPs in the country as a great asset to bridging the digital divide, by creating a spectrum where WISP's can operate with much less interference than they endure in the unlicensed bands would improve the customers experience dramatically. 3.65-3.7 was a great step have another 500 mhz would be an amazing and explosive growth possibility.

Sincerely,

Jason Pond, CEO

Grizzly Broadband, LLC
d/b/a Cybernet1



August 27, 2019

Reference: GN Docket No. 18-122, RM-11791, RM-11778

Marlene H. Dortch
FCC Secretary
445 12th Street, NW
Washington, DC 20554

Dear Marlene H. Dortch and the FCC,

Our business is a small, rural, country business in Haralson County, GA. We provide internet to small town living country folks that need internet to run in home businesses, farms, home school children, daily living, etc. We currently have around 340 customers, 15 towers, and growing daily.

We intend to use C-band spectrum every day to provide this high-speed internet to our current and future customers. The areas we provide service for has no infrastructure and even the City Councilmen have no idea how to fix it. We have pulled out of our own pockets in order to raise the value of living in these areas. In certain areas we cover, there are no other options at all. They have lived years and years in their homes without an Internet provider.

Our consumers who are using it for daily living are trying to keep their living cost down by "cutting the cord" on TV services. With this in mind, these consumers are consistently using their data and want the fastest speeds possible. They are using more and more bandwidth per household. Don't even get us started with the growing number of gamers on our current system. Gamers like to "hog" the bandwidth in their area for sure.

This rural area has no guarantee the bigger companies with their grants and fancy labeling even care about them. They are underserved. They have no guarantee they will be able to access the CDRS Priority Access Licenses or any other mid-band spectrum at FCC auction. These people are the people that still live a life a little more simple, but do not mean that they cannot have a better quality life with access to better internet.

Therefore, taking away or pulling from the C-band will not only hurt our current business structure, but will hurt our community, our growth, our development, and our way of living. It will significantly impact the "mom and pops" that are few and far between. It will mean the small amount of population we currently have will further to decrease. It will mean that our small business that is growing will not continue to grow.

Please take our growth and development in your thoughts and considerations.

Thank you,

A handwritten signature in blue ink, appearing to read 'Kevin Boulton', is written over a blue horizontal line.

Kevin Boulton
HCI – HighSpeed Country Internet
404-215-3280



Josh Luthman
1100 Wayne Street
Suite 1337
Troy, OH 45373

August 27, 2019

Marlene H. Dortch
FCC Secretary
445 12th Street, NW
Washington, DC 20554

Dear Marlene Dortch,

Imagine Networks is a Wireless Internet Service Provider based out of Troy, OH. We focus on serving the unserved and underserved community of the Miami Valley. Our tallest towers struggle to find customers in the triple digits and many of our sites struggle to serve the customers we currently have primarily due to insufficient spectrum and trees.

A prime example of this is in Elizabeth Township. Many of these customers are employed by the Wright Patt Air Force Base. Serving this area, we have deployed 2.4, 3.65, and 5 GHz. We can not deploy 900 MHz due to the lack of frequency and the unforgiving noise generated by non-ISP use. All three of the bands we can use are providing as fast of service as we can offer. 5 GHz is purely line of sight (LOS) with only a few customers, 2.4 GHz is completely full, and 3.65 was our most recent addition. The 3.65 band that has made it easier to work through trees and the C band could potentially help with as well due to the similar wavelength.

All of our customers expect faster services as time goes on. We are in the process of launching a newer plan offering 25 x 3 Mbps, but need the spectrum to do so! The 2.4 and 5 GHz bands are filled with countless devices, again non-ISP use. 3.65 is in an unknown state today and our best guesses don't include a guaranteed CBRS PAL. We are left with no clear future for spectrum to deliver Internet service. Imagine Networks will definitely use whatever C band spectrum that is made available to us on a shared basis with earth stations.

Sincerely,

Josh Luthman, Imagine Networks

August 29, 2019

Marlene H Dortch
FCC Secretary
445 12th Street, NW
Washington, DC 20554

RE: GN Docket No. 18-122, RM-11791, RM-11778

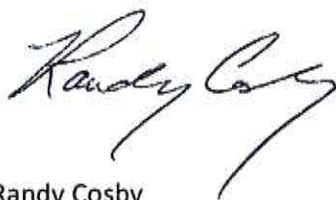
To Whom It May Concern:

InfoWest is an ISP with a long history in Southern Utah. Our company dates to the early 1990s. We provide broadband internet access using fiber optic and fixed wireless technologies through much of the state of Utah and parts of Nevada and Arizona. Our wireless footprint covers over 10,000 census blocks, much of it in rural, underserved areas. We currently utilize unlicensed frequencies for most of our fixed point-to-multipoint wireless access.

As we have grown to serve over ten-thousand households, our available spectrum has become congested and we are having difficulty meeting demands for higher speed services. We have been experimenting with 3.65 GHz (LTE) equipment and understand that the favorable propagation benefits such as near line-of-sight (NLOS) of this band would be available in the C-Band. Such benefits are not possible using available unlicensed frequencies such as 5GHz which prevents us from expanding into many rural areas with challenging terrain and more trees.

In anticipation of future growth in high-speed broadband access demand, and to meet current needs we are prepared to immediately use the C-band spectrum when it is available for shared use. We encourage the FCC to allow coordinated, shared use of the C-Band spectrum to this end.

Sincerely,



Randy Cosby
Vice President

435-674-0165 / www.infowest.com

Corporate Office: 435 E Tabernacle, St. George UT 84770

Regional Offices:

360 W 200 North, Cedar City UT 84720

136 N Main Street, Richfield UT 84701

400 S Main Street, Panguitch UT 84650



GN Docket No. 18-122, RM-11791, RM-11778

August 27, 2019

Marlene H. Dortch
FCC Secretary
445 12th Street, NW
Washington, DC 20554

Dear Ms. Dortch,

For the last 25 years, Little Apple Technologies Inc., a local family owned business located in Manhattan, MT, has been providing high-speed internet service to the rural areas around the Gallatin Valley, serving approx. 2,000 customers; both residential, educational and business. For a majority of our customers, LAT is the only option for high-speed internet other than satellite.

LAT (along with all WISPs) is in desperate need of more spectrum to meet the increased demand for more bandwidth to the consumer to bridge the digital divide. We currently utilize ALL available unlicensed spectrum (900MHz, 2.4GHz, and 5GHz). Furthermore, LAT has been deploying under the NN licensing for many years now as a means of providing higher speeds to our customers.

LAT has been successful deploying 3650MHz equipment under the NN license. With only 50MHz of spectrum, there is a limit to how many customers you can service at the speeds they demand. LAT is extremely interested in expanding even further into the "unserved" and "underserved" areas where we live. Unfortunately, we are having to turn away potential customers in our current service areas because there is not enough spectrum to meet ever increasing bandwidth demands. Furthermore, there is no guarantee that LAT will be able use the CBRS Priority Access Licenses or obtain mid-band CBRS spectrum at auction. LAT has positioned itself to utilize the CBRS when launched however we fear that this alone will not be enough

Enabling access to the C-band frequencies would certainly alleviate that problem. Enabling access to the C-band spectrum for shared use would not only allow LAT to meet the needs of its current customers, but also to expand to the "unserved" and "underserved" areas. However, there needs to be enough shared spectrum to really make a difference for all customers whose only option is a Wireless Internet Service Provider (WISP).

Sincerely,

A handwritten signature in blue ink, appearing to read "Paul Tackett", is written over a horizontal line.

Paul Tackett, COO



LONE PINE COMMUNICATIONS

PO BOX 867
223 N Jackson
Lone Pine CA 93545

www.lonepinecommunications.com P: (760) 876 5461 F: (760) 876 9101

August 27, 2019

Marlene H. Dortch
FCC Secretary
445 12th Street, NW
Washington, DC 20554

RE:GN Docket No. 18-122 RM-11791, RM-11778

Dear Marlene Dortch,

I am writing you today about Lone Pine Communications plan to use 3700-4200 MHz Band "C-Band" to deliver high speed internet to rural California. We are a small Internet Service provider located in Lone Pine California. We provide Lone Pine surrounding areas with fixed wireless along with the towns of Olancho and Keeler California with Fixed Wireless. We are located in an interesting geographical area in between the highest point Mt Whitney and the lowest point Death Valley in the United States. This also makes it challenging to provide service to some areas. With the high demand for high speed internet in rural area's the importance of having backhaul without congested spectrum is key. The 2.5 GHz band of spectrum has become so saturated it has become almost un useable in our area. Which then makes it really difficult to provide good internet quality in some areas due to the congestion of the spectrum. With more options of spectrum, we would be able to increase speed and connectivity in most all the areas we service.

Thank you for your time.

Best Regards,



Liz Branson

MIMBRES COMMUNICATIONS

August 29, 2019

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

Re: Expanding Flexible Use of the 3.7 GHz Band
GN Docket No. 18-122
RM-11791
RM-11778

Dear Ms. Dortch:

Mimbres Communications provides Broadband Internet Access to unserved and under-served residents and businesses located in rural Grant County, New Mexico. We deliver service using a mix of licensed and unlicensed bands, with most of our PtMP customer links operating in the unlicensed 5 GHz band. The low EIRP limits for much of those bands and the dramatic increases in both number and type of devices deployed there are making it more and more difficult to find and maintain clear channels.

Our customers are using more data and demanding higher speeds that are currently not practical over the distances we operate at in these remote, rural areas. Most areas where we historically used 40 MHz channels are now constrained to 20 MHz channels in order to maintain the reliability and low latency our clients expect from us.

Last October's revisions to Part 96 make acquiring Priority Access Licenses unlikely for us. The uncertainty associated with GAA is not something we can build a business plan on, but Part 101 coordination would be different. The mid-band frequencies currently under discussion would allow us to deliver 100+ megabit speeds to our end users within months of being made available.

Coordinated sharing with existing co-primary users will maximize spectrum utilization and dramatically increase the available capacity and opportunities for numerous small providers located across rural America.

Thank you;



Kurt Albershardt
Managing Member
Mimbres Communications, LLC
Silver City, New Mexico



David Jones
NGL Connection
933 Main St. Evanston WY 82930
Office Phone (307)288-5491 ext 702
dave@nglconnection.com

Reference to GN Docket No. 18-122, RM-11791, RM-11778

Marlene H. Dortch
FCC Secretary
445 12th Street, NW
Washington, DC 20554

We are a small WISP here in Evanston Wyoming. We serve about 2400 customers. we are extremely rural as our largest population center that we service is only 12k population. The area of the three counties we cover exceeds 11,000 sq miles, and 12k population is the largest in that area.

Even in this remote part of the country we are running into large problems of interference and congestion. the 900mhz band, 2.4ghz band and 5ghz band are completely swamped with house electronics. A good example is home routers using 160mhz in the 5ghz band and 40mhz in the 2.4ghz band right out of the box. This makes it so that the antenna on the roof will not work if they are in the same bands.

That leaves us with the small sliver of bandwidth available in the 3.65ghz band. Unfortunately in our very rural area there are 4 other entities using it in this area and 3 of them are using the entire 50mhz available. It becomes a struggle to offer 20mbps in this band. I believe we are to small to be able to purchase CBRS frequencies.

With 300mhz available in the C-band our rural customers can finally get the bandwidth that they are demanding. Giving them a way to cross the digital divide. With this spectrum the rural people of Wyoming would be able to enjoy near gigabit speeds. We could off these speeds up to 10 miles from towers. Right now in order to do these speeds we need to use 60ghz. the range is extremely prohibitive for rural as it will only go a quarter of a mile before it needs another tower.

If C-band was to open up for coordinated sharing we would utilize this immediately. We fully support sharing 300mhz of the C-band.



Marlene H. Dortch
FCC Secretary
445 12th Street, NW
Washington, DC 20554

An Open Letter:

Our company, Plains Internet, which is based out of Amarillo, Texas and covers the surrounding counties for hundreds of miles, would like to formally request access to the C-band spectrum that the FCC may be considering auctioning off. We have nearly 4,000 rural and urban customers in both the residential and commercial arenas. We provide tremendous value to our communities, and help said communities exponentially increase that value through reliable connectivity.

We are seeking access to this C-band spectrum as it would allow us to immediately provide high speed, fixed point-to-multipoint service as it is available for shared use. This would be a great benefit to the communities we service and would also help us generate further revenue to invest into other communities we've as of yet been able to help.

Spectrum is already hard to come by in our region, causing many people to suffer less than ideal bandwidth limitations or be unable to have proper connectivity access. Those who do have connectivity have an ever-increasing need for more bandwidth as the economic landscape grows and more and more of each of our daily lives is brought online. With the standard of living increasing only as long as you have the proper amount of bandwidth to match the needs, it is bordering on cruelty to allow those living or working in non-standard, low density population areas to be left behind when such a simple and elegant solution is available. Having no guarantee that we will be able to use CBRS Priority Access Licenses or acquire other mid-band spectrum at FCC auction, we can only ask that for the betterment of our customers and communities, the C-band spectrum is made open for shared use.

Thank you for your consideration.

Warmest regards,

Plains Internet
7519 Canyon Drive
Amarillo, TX 79109
www.plainsinternet.com



417 Wayne Avenue, Suite 101
Defiance OH 43512-1121
Phone: 888-999-8002

August 29, 2019

Marlene H. Dortch
FCC Secretary
445 12th Street, NW
Washington, DC 20554

Re: GN Docket No. 18-122, RM-11791, RM-11778

Dear Ms. Dortch:

MetaLINK Technologies, Inc. (MetaLINK) is a rural regional fixed wireless provider with service offerings in Northwest Ohio, Northeast Indiana, and Southern Michigan. Founded in 1996 as a dial-up Internet service provider (ISP), over the years we have transitioned our network to provide broadband Internet via fixed wireless and today serve over 10,000 customers. What we need today is affordable, renewable, licensed spectrum capable of providing high-speed broadband access for small rural providers. A spectrum offering in the 3700-4200 MHz (C-band) spectrum would be a step in the right direction.

The problem that our company has been facing in the unlicensed bands is increased congestion and capacity limitations which hinders the ability to serve everyone with the faster speeds that they desire. Licensed frequency with the capabilities of enabling gigabit and near-gigabit fixed wireless Internet service at distances of five miles or more is desperately needed to span the digital divide in rural America. Additionally, the need for a protected licensed spectrum is necessary to ensure quality of service which is near impossible to manage and guarantee in the unlicensed spectrum. Finally, the spectrum must be affordable for the small rural provider to purchase in order to ensure a competitive market and quick deployment.

Earlier this year within our coverage area, MetaLINK successfully bid on and secured 28 GHz spectrum for deployment of middle and last mile 5G fixed wireless networks. While mmWave technology is quite desirable for offering gigabit and near-gigabit high-speed broadband access, its' limitation is that it can only be used to serve those in close proximity to our points of broadcast. Thus, mmWave technology is not feasible for serving the vast majority of rural America with 5G technology whereas mid-band spectrum such as C-band would be ideal for rural broadband speeds at the FCC's definition and higher.

To summarize, our rural customers are using more and more bandwidth requiring more capacity faster than incumbent companies can deploy. In order to meet their needs, companies like ours need large amounts of spectrum in the mid-band spectrum range to be affordable, renewable, and geographically sized. Please consider auctioning the lower 200 MHz for flexible use and permit coordinated sharing in the upper 300 MHz among the earth stations and point-to-multipoint operations so small entities such as MetaLINK can quickly deploy 5G technology in rural America.

Sincerely,

A handwritten signature in blue ink that reads "Todd Harpest".

Todd Harpest
External Affairs & Regulatory Director

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August 23, 2019

Letter to FCC Re. GN Docket No. 18-122, RM-11791, RM-11778

Marlene H. Dortch
FCC Secretary
445 12th Street, NW
Washington, DC 20554

Dear FCC Commissioners:

I am writing you this letter regarding the above Docket (GN Docket No. 18-122, RM-11791, RM-11778) and wish to address our companies current use of the CBRS spectrum.

We are a small WISP in the Counties of Monterey, San Juan Bautista, Santa Cruz and Santa Clara California. We have a system that currently serves over 2400 customers in areas that surround the Cities in these Counties. We serve almost entirely the customers located in the rural parts of these counties that have little or no other choice but a wireless solution.

We obtained a license to utilize the 3.65 GHz spectrum many years ago in order to provide our customers with more bandwidth opportunities. We worked with the local Earth Station owners engineering team to ensure that our deployments would not interfere with the use of their Stations. To that extent we were granted permission to utilize the spectrum in our service area. This allowed us to begin to provide higher bandwidth to our customers. However, over the past 4 plus years we have not deployed in this space due to the rapid changes in the rules for this service and the fact that the increase demand for bandwidth is out pacing the small amount of band that is available in this spectrum. If more of this spectrum became available, we would utilize this spectrum immediately to enhance our existing service levels which are currently up to 1 Gbps to provide the experience our customers should have.

Our customers are demanding and utilizing more bandwidth as many devices now in the home use the Internet connect to operate many functions.

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This increase in demand has changed drastically. As an example, when we started providing service in 2004 our highest service level was 2 Mbps. Now, our average customer wants at least 20 Mbps of service to handle the load from streaming services and other applications currently available. All of this is happening while the number of competing WISPs in our area has rapidly stripped the available 5.7 and 5.4 GHz spectrum, the home routers and other devices have eliminated the use of the 2.4 GHz spectrum and the local Electrical company had eliminated the use of the 900 MHz spectrum by utilizing it for their smart meters. Therefore, we are left with the dilemma of trying to increase our capacity to our customers while dealing with available bands that are being eliminated or significantly reduced. We have been utilizing the 3.65 GHz band and understand that the propagation properties are similar to the 3.7-4.2 GHz band. These properties allow us to provide higher levels of service over greater areas and therefore, reduce capital costs to provide these services to areas we want to expand into as well as the areas we already serve. This, to a small business, is very significant and would allow us to meet the needs of the existing and future customers over time.

Based on our company size and financial status it is highly unlikely that we will be able to benefit from the CBRs Priority Access License. Furthermore, we, based on history, would not be able to acquire other mid-band spectrum through FCC auctions. This limits our ability to increase the offerings we need to allow our current and future customers the bandwidth they are going to require.

It is our express hope that, you the Commissioners will see that small businesses like ours have been filling the bandwidth needs in these rural areas and that in order to continue to provide these needs, spectrum availability is a key to the services that customers are demanding and we, the small operators, are able to provide to keep that need filled.

Sincerely,



Anthony J. Iacopi

CTO

Razzo Link, Inc.



REACH4
communications

337.783.3436

www.reach4com.com

927 N. Parkerson Ave., Crowley, LA 70526

PO Box 691, Crowley, LA 70527

GN Docket No. 18-122, RM-11791, RM-11778

August 23, 2019

Marlene H. Dortch
FCC Secretary
445 12th Street, NW
Washington, DC 20554

Dear Ms. Dortch,

For the last 15 years, Gonthier, Inc. dba REACH4 Communications, a family owned business located in Crowley, LA, has been providing high-speed internet service to the rural areas around Crowley, LA and serves over 2,000 customers; both residential and business. For 90% of our customers, REACH4 is the only option for high speed internet other than satellite.

REACH4 is in desperate need of more spectrum to meet the increased demand for more bandwidth. We currently use ALL available unlicensed spectrum (900MHz, 2.4GHz, and 5GHz). Furthermore, when the "licensed-light" 3650MHz frequencies became available, REACH4 immediately began a major upgrade to provide higher speeds to our customers. REACH4 has been very successful deploying 3650MHz equipment, but with only 50MHz of spectrum, there is a limit to how many customers you can service at the speeds they demand.

REACH4 would love to expand to the "unserved" and "underserved" areas where we live. But unfortunately, we are having to turn away potential customers in our current service areas because there is just not enough spectrum to meet bandwidth demands. Furthermore, there is no guarantee that REACH4 will be able use the CBRS Priority Access Licenses or obtain mid-band CBRS spectrum at auction. Enabling access to the C-band frequencies would solve that problem.

Enabling access to the C-band spectrum for shared use would not only allow REACH4 to meet the needs of its current customers, but also to expand to the "unserved" and "underserved" areas. However, there needs to be enough shared spectrum to really make a difference for all customers whose only option is a Wireless Internet Service Provider (WISP).

Sincerely,

Jay Domingue
Business Development

Resound Networks LLC

119 Western St. Pampa, TX

PO Box 1741

800-806-1719



resoundnetworks.com

GN Docket No. 18-122, RM-11791, RM-11778

August 23, 2019

Marlene H. Dortch
FCC Secretary
445 12th Street, NW
Washington, DC 20554

Re: C-Band 3700-4200 MHz

Dear Ms. Dortch:

Resound Networks, LLC is a WISP headquartered in Pampa, Texas currently serving just under 6000 subscribers in West Texas and New Mexico. Our focus and network expansion plan targets underserved rural America. We would absolutely utilize C-band spectrum in the 3.7-4.2 GHz band if made available for shared use. This would enable us to immediately fill the demand for high-speed, fixed point-to-multipoint service over our network.

The demand for reliable high-speed bandwidth in rural America is increasing at an enormous rate. Consumers are engaging the IoT and challenging available capacity in 5 GHz and 3.65 GHz spectrum. Limited spectrum is choking our ability to meet the needs of these underserved communities by offering better competition and choices.

Resound Networks has deployed 3.65 GHz equipment for which the implementation of CBRS managed spectrum will create additional capital requirements and budget appropriations. This existing equipment has similar propagation characteristics and can be utilized in the C-band spectrum. Our ability to utilize the C-Band spectrum will become a huge benefit to rural underserved America by allowing capital to be allocated for equipment and immediate deployment of reliable high-speed service to the end users opposed to unguaranteed Priority Access Licenses auctioned by the FCC.

We respectfully request you enable access to the 3700-4200 MHz band for use in rural America.

Sincerely,


Bryan Waldrip
Chief Executive Officer


Chadd Giles
Chief Operations Officer



August 27, 2019

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

Re: GN Docket No. 18-122, RM-11791, RM-11778

Dear Ms. Dortch:

JAB Wireless, Inc. dba Rise Broadband (Rise Broadband) submits these comments to support fixed point-to-multipoint use of C-band spectrum. Rise Broadband is the largest privately held provider of fixed wireless broadband services in the country. We serve primarily rural customers in 16 states using unlicensed spectrum in 5 GHz, licensed 2.5 GHz spectrum and “lightly licensed” spectrum in the 3650-3700 MHz band. We are strong proponents of opening up the C-band for fixed point-to-multipoint use.

Although Rise operates in areas often ignored by larger wireless and wireline companies, spectrum congestion and noise floors continue to rise. Demand for quality broadband service continues to climb with an average customer utilizing over 175 GB of data per month.

Propagation characteristics in C-band spectrum will be more favorable such as that in 3.65 GHz, where we experience better non line-of-site performance and connect rates than in bands such as 5 GHz. Mid-band choices today such as 3.65-3.7 GHz spectrum have already become severely congested, and although CBRS spectrum will become available, there is no guarantee this too will not become quickly congested with PALs sold off to larger companies. 2.5 GHz is generally not available today and will also be auctioned off to the highest bidders.

Access to mid-band spectrum is scarce with little in sight in coming years, we look to C-band to fill this important niche. We believe the equipment ecosystem will develop rapidly and companies like Rise will be quick to deploy in this spectrum to bring higher quality service to existing customers and choice to people that have little or none.

Sincerely,

/s/ Jeff Kohler

Jeff Kohler

Co-Founder and Chief Development Officer



GN Docket No. 18-122, RM-11791, RM-1178

To: Marlene H. Dortch

FCC Secretary

445 12th Street, NW

Washington, DC 20554

Ms. Dortch,

We are SignalNet Broadband, a WISP, located in Wylie, Texas. We are a small, locally owned business with 89 current customers in the East Texas area (Wylie, Pittsburg, Mt. Pleasant, Winnsboro & Scroggins TX) Areas.

Our company would use the C-band spectrum for the following reasons –

As of now with the 3.65 band we are using we are only able to run 10Mhz channels which limits the throughput we can provide to our customers. With CBRS all of our gear would be able to provide more bandwidth and throughput to our customers that they already now are requiring, after finally being introduced to having internet available to them for the first time. This would only be a firmware upgrade from Cambium to be CBRS compliant. We have been waiting on this for 4 years now for CBRS and the rules to drop from the FCC and still nothing has happened. If we were a big carrier advocating for this it would have it most likely. They seem to cater to the Bigger ISP's in general or altogether.

Our consumers are using more and more bandwidth and require more capacity for us to be able to compete and keep up with the demand of today's internet usage and smart devices.

- Other bands 5Ghz are over congested so much so we are having to use less power on DFS channels which limits our capacity to compete fairly and offer more to our customers in general. And this is causing us more issues like we are having difficulty meeting demand, and offering higher speeds, for more services such as VoIP and TV services etc.;
- We have the money to expand service to other areas that are unserved or underserved, and we want to provide better competition and choices to the community's we service;
- We are using 3.65 GHz equipment and understand that the propagation characteristics are similar in the 3.7 to 4.2 GHz band;
- We have no guarantees that we will be able to use CBRS (PAL) Priority Access Licenses or acquire other mid-band spectrum at FCC auction; WE NEED CBRS to HAPPEN and HAPPEN SOON!



Thank you in advance for your attention to this matter.

Sincerely,

Stephen M. Lash

President/CEO

SignalNet Broadband, Inc.



August 30, 2019

Reference GN Docket No. 18-122, RM-11791, RM-11778

Marlene H. Dortch
FCC Secretary
445 12th Street, NW
Washington, DC 20554

Ms. Dortch:

We are writing to you today in regard to the shared use of the C-Band spectrum.

As Southern Arizona's largest Wireless Internet Service Provider (WISP), we are very concerned that we will not be able to use this spectrum to deliver high speed Internet services to our customers.

Simply Bits is headquartered in Tucson, AZ and we have over 6000 customers that rely on our Internet service in the largest metropolitan market in Southern Arizona, including, but not limited to, the Tucson metro area, Marana, Vail, Oro Valley, Green Valley, Rio Rico, and Sahuarita. Our service area encompasses more than 1,000 square miles and includes more than 1 million people.

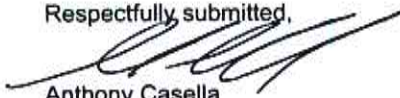
Over the last few years we have begun to expand our service area beyond our current footprint listed above however, we are concerned that we may not have the spectrum available to support this expansion to the unserved and underserved markets as well as areas to provide more competition and choices to our customers. These markets do not have any reasonably acceptable Internet options due to many factors including rough terrain and limited access to basic amenities that metro areas enjoy. The C-Band spectrum will allow us to deliver Internet to these markets since it carries tremendous amounts of data over varying and challenging terrain mostly located in these market areas.

The spectrum bands in many areas of Southern Arizona are congested and we are constantly adjusting our network to avoid conflicts in un-licensed spectrum. For example, 5 GHz and 3.65GHz are very congested and we are seeing congestion in 24GHz as well in some parts of Arizona. We have removed 900MHz and 2.4GHz equipment years ago due to similar congestion. In the licensed space, it is becoming difficult to find 11 and 18GHz frequency pairs in our area. Since there is no guarantee that we can acquire CBRS Priority Access Licenses at auction, or any other mid band spectrum, we must rely on the shared use of publicly available spectrum which includes the C-Band.

Consumer use of the Internet has grown considerably with the advent of "cord cutting" allowing consumers a choice in what services they pay for. We have seen this cord cutting movement place a 15% increased demand on our network and we must be able to use whatever measures are available to us to remain competitive in the marketplace. Our customers want choices and don't want to be reliant on the largest telecom corporations like Cox, Comcast, CenturyLink, Verizon, and AT&T to provide them service. We differentiate ourselves by providing local customer service, no hidden fees, and no data caps.

Having the FCC make available shared C-Band spectrum to WISP's is a step in the right direction to relieve congestion, conflict, and provide alternative Internet providers to our customers in the unserved and underserved markets. WISP's play a large role in reducing the rural urban digital divide and thus why we support the shared use of the C-Band spectrum.

Respectfully submitted,



Anthony Casella
Managing Director
Simply Bits



27th August 2019

Marlene H. Dortch
FCC Secretary
445 12th Street, NW
Washington, DC 20554

Ref GN Docket No. 18-122, RM-11791, RM-11778

SmarterBroadband, Inc. is a fixed wireless Internet service provider located in Nevada County, California. We currently service 3,400 customers with broadband over fixed wireless. The area we service is rural with limited options outside of the towns.

We intend to use C-Band to provide even higher speed service to our existing and new customers using point to multi point fixed wireless as soon as it is available for shared use.

As a fixed wireless internet provider, this spectrum is vital because;

- Our customers are using more and more bandwidth and we need more capacity to fulfill their requirements.
- The other bands we use are congested restricting our ability to provide more capacity.
- We are currently using 3.65 GHz equipment and understand the propagation characteristics are similar in the 3.7 to 4.2 Ghz band.
- We have no guarantee we will be able to obtain CBRS Priority Access licenses.
- We do not believe we will be able to obtain other mid-band spectrum at FCC auction
- It will enable us to expand service into unserved or underserved areas.

Yours Sincerely

/s/ Adam Brodel

Adam Brodel
President & CEO
SmarterBroadband, Inc.

15533 Johnson Place ♦ Grass Valley ♦ CA 95949 ♦ Tel: (530) 272 4000
www.SmarterBroadband.com



August 29, 2019

Via ECFS (GN Docket No. 18-122)

Marlene H. Dortch
FCC Secretary
445 12th Street, NW
Washington, DC 20554

*Re: Expanding Flexible Use of the 3.7 to 4.2 GHz Band
GN Docket No. 18-122, RM-11791, RM-11778*

Dear Ms. Dortch:

SPITwSPOTS, Inc. ("SPITwSPOTS") provides fixed wireless broadband access services in rural Alaska. We offer residential broadband plans with speeds of up to 150 mbps via 900 MHz, 2.4 GHz, 3.65 GHz and 5.470-5.825 GHz frequency bands, in addition to other more specialized business services. We contribute to the record in this proceeding¹ because of our interest in access to new spectrum for fixed point-to-multipoint services.

Our small company works every day to make efficient and effective use of the spectrum being made available for broadband Internet access services. Many of our more than 2,100 customers live in extremely rural, remote areas within the Kenai Peninsula Borough. SPITwSPOTS prides itself on offering a competitive broadband alternative and service to unserved and underserved areas of Alaska – areas that are difficult to serve due to terrain, location, weather and other factors.

In response to these circumstances, SPITwSPOTS developed extensive experience operating in spectrum designated for shared use. While 3.65 GHz and other spectrum bands have allowed us to serve customers in remote areas that are costly to deploy, as services proliferate, so does the need for sufficient spectrum capacity to meet those needs. Should the

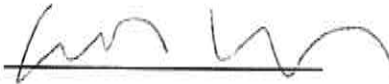
¹ *Expanding Flexible Use of the 3.7 to 4.2 GHz Band; Petition for Rulemaking to Amend and Modernize Parts 25 and 101 of the Commission's Rules to Authorize and Facilitate the Deployment of Licensed Point-to-Multipoint Fixed Wireless Broadband Service in the 3.7 to 4.2 GHz Band; Fixed Wireless Communications Coalition, Inc., Request for Modified Coordination Procedures in Band Shared Between the Fixed Service and the Fixed Satellite Service, GN Docket No. 18-122, RM-11791, RM 11778.*

FCC make C-Band spectrum available for shared use, SPITwSPOTS would welcome the opportunity to make use of the spectrum to further enhance its services to rural Alaskans. We expect to take the expertise we've developed in the 3.65 GHz band and apply it to operations in the nearby C-Band frequencies.

We anticipate that if C-Band spectrum is made available for fixed point-to-multipoint service, SPITwSPOTS would be ready and able to make effective use of the spectrum on an expedited basis.

Respectfully submitted,

SPITwSPOTS, Inc.

By: 

Name: Aaron Larson

Title: CEO

TOTAL HIGH SPEED

Total Highspeed Internet Service



Marlene H. Dortch
FCC Secretary
445 12th Street, NW
Washington, DC 20554

Total Highspeed Internet Solutions
1091 W Kathryn Street
Nixa, MO 65714

Re: GN Docket No. 18-122, RM-11791, RM-11778

Madam Secretary,

Total Highspeed Internet Solutions is a broadband internet provider based in Nixa, Missouri. We serve mainly rural customers in southwest Missouri and have over 7000 customers presently. We make it our mission to provide internet to those whom infrastructure doesn't serve, and we work diligently at our task to ensure we can bring broadband internet to rural locations.

Our company intends to use C-band spectrum immediately to provide high-speed, fixed point-to-multipoint service if it is available for shared use. The reasons we will be using this spectrum include the following:

- Consumers are using more and more bandwidth and/or require more capacity
- Other bands such as 900 MHz, 2.4 GHz and 5 GHz are congested such that we are having difficulty meeting the demand to offer higher speeds
- We would like to expand service to other areas that are unserved or underserved, and we want to provide better competition and choice to the community in areas that are already considered "served"
- We are using the limited 3.65 GHz equipment, and because the propagation characteristics are similar in the 3.7 to 4.2 GHz band, the spectrum expansion would create a great opportunity to serve even more of the currently unserved or under-served in our service area
- We have no guarantee that we will be able to use CBRS Priority Access Licenses or acquire other mid-band spectrum at FCC auction

Because of these reasons, we ask that you allow us access to this spectrum rather than auctioning it to the monolithic companies that don't have the best interest of the rural community in their decision



making. The FCC is a public-serving entity and should have the best interest of the public guide their actions. In summary, we are asking that you:

- Clear the lower 200 MHz of earth stations and re-locate them to the upper 300 MHz;
- Auction the lower 200 MHz for flexible use (e.g., 5G); and (importantly)
- Permit coordinated sharing in the upper 300 MHz among the earth stations and point-to-multipoint operations.

Thank you for your time and attention to this matter.

Sincerely,



Travis Allen
Owner and CEO
Total Highspeed Internet
1091 W Kathryn Street
Nixa, MO 65714
(417) 851-1107 x 1001



2433 Curtis St, Denver, CO 80205
(720) 408-0066

August 29, 2019

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

Re: Expanding Flexible Use of the 3.7-4.2 GHz Band
GN Docket No. 18-122, RM-11791, RM-11778

Dear Ms. Dortch:

Verso Networks/WiFiHood is a Wireless ISP serving the Denver metro area with competitive broadband Internet service to single-family residential, multi-family residential, and small business customers. We deliver speeds from 25/5 Mbps to 500/500 Mbps to 1,800 customers and we are growing steadily. Although we are currently a very small operator, we are becoming a popular alternative to Comcast and CenturyLink because we are a local company that delivers competitive price/performance with a superior customer experience. Contrary to the conventional wisdom that only rural areas are underserved, there are many places within urban areas that remain underserved and we are a solution for many such places in the Denver metro area.

We are a member of WISPA and support their position regarding flexible use of the 3.7-4.2 GHz ("C-band"), namely coordinated sharing in the upper 300 MHz among earth stations and point-to-multipoint operations. This new spectrum will solve much of our capacity and reliability problems by enabling point-to-multipoint services at speeds over 100/100 Mbps without interference. We have almost exhausted our capabilities in the 5 GHz and 3.65 GHz bands. The CBRS band will not help us since we are a small operator in an urban area that cannot compete for PALs, and there will not be enough GAA bandwidth to spread around. We desperately need new spectrum to grow the company.

The C-Band sharing proposed by WISPA will enable WISPs to remain competitive and innovative, to the benefit of consumers who want fast, reliable service and competitive choices. The amount of spectrum is significant, and it is in a range that WISPs already have lots of experience with. This spectrum would justify an immediate buildout for overlay and footprint expansion as soon as equipment becomes available. It will be a beautiful thing for consumers across the country when WISPs are unleashed with this new spectrum, so we strongly encourage the FCC to make it happen.

Sincerely,

A handwritten signature in black ink that reads "William Fowler". The signature is written in a cursive, flowing style.

William Fowler
President