

**Before the
Federal Communications Commission
Washington, DC 20554**

In the Matter of)	
)	
Connect America Fund Phase II Auction)	AU Docket No. 17-182
)	
Connect America Fund)	WC Docket No. 10-90
)	
)	

COMMENTS OF CALIFORNIA INTERNET, L.P. DBA GEOLINKS

California Internet, L.P. DBA GeoLinks (“GeoLinks” or the “Company”) submits these comments in response to the Public Notice issued August 4, 2017 in the aforementioned dockets.

I. INTRODUCTION AND SUMMARY

GeoLinks is proud to service the largest coverage area of any single fixed wireless Internet service provider in the state the California. While the Company had previously focused on business and enterprise customers, in 2016, GeoLinks expanded its customer base to include nearly 30 rural school districts and surrounding communities throughout the state that previously had not had access to any high-speed broadband service. As the Company expands, it strives to reach more unserved and underserved areas within California and beyond, including residential areas. GeoLinks provides these comments regarding the proposed procedures to be used in the Connect America Fund II Auction (“Phase II Auction”) to promote robust broadband deployment in unserved, rural areas across the United States.

II. DISCUSSION

A. The Commission Should Retain the 95% Coverage Requirement

In the Public Notice, the Commission seeks comment on whether an applicant should be required to demonstrate that its network could be engineered to deliver the required service to every location in the relevant census blocks, as determined by the Commission.¹ While

¹ Public Notice at para. 36.

GeoLinks supports the notion that a Phase II Auction awardee should have the technical capability to support a significant portion of the eligible census block for which the award is granted and should commit to serving a certain minimum number of locations within the award area, GeoLinks does not believe that a requirement to serve 100% of all required locations is practical. Moreover, the Company believes that such a requirement may hinder the Phase II Auction process.

A requirement to provide 100% coverage may create two scenarios that will only serve to stifle the Phase II Auction process. First, there will inevitably be eligible census blocks where, depending on topography, geography, or distance between some required locations (i.e. remotely located homes or farms), no carrier will be able to reach 100% of the locations within them. Second, depending on the same factors, 100% coverage may be prohibitively expensive to serve even if all locations are technically reachable. In either event, the result could be that many eligible areas receive no bids under the Phase II Auction – a scenario that benefits no one.

For this reason, GeoLinks suggests that the Commission continue to require that applicants demonstrate that its network can be engineered to serve 95% of all required areas within an eligible census block. If the Commission wishes to encourage additional coverage, GeoLinks suggests that any coverage capability over 95% be taken into account after the other factors (price, speed, latency, etc.) are considered for scoring purposes.

B. The Commission Should Craft Spectrum Policy to Benefit Eligible Phase II Auction Areas

In the Public Notice, the Commission proposes to require each applicant that intends to use radiofrequency spectrum to submit information regarding the sufficiency of the spectrum to which it has access to aid the Commission in determining applicants' capability to meet the public interest requirements of the Phase II Auction.² As an initial matter, sparsely populated rural areas, which GeoLinks envisions many of the eligible census blocks will be, are not well suited for traditional, wired broadband service given the cost to build and deliver a cable/ fiber-based network. With the emergence and growing popularity of fixed wireless technology, new opportunities to connect rural communities are becoming available. GeoLinks believes that the

² See Public Notice at para. 37.

Phase II Auction presents an opportunity to not only connect unserved, rural areas to high-speed broadband via wireless technology, but also for the Commission to develop spectrum licensing policies specifically focused on these types of areas.

In its submission in response to the Commission's Public Notice seeking comment on rules for the 3550-3700 MHz band, GeoLinks explained that Priority Access Licenses ("PALs") in that band should be granted in a manner that promotes competition and accounts for regional broadband needs. Specifically, GeoLinks urged the Commission to consider whether rural areas would benefit more from PALs being granted based on smaller geographic areas rather than Partial Economic Areas ("PEAs"). The Company suggested census tracts or counties as options, however, for the purposes of the Phase II Auction, the Company now sees an opportunity for the Commission to award PALs by Phase II Auction award areas (either by census block group or by entire award area).

GeoLinks, as a fixed wireless broadband provider, predominantly uses spectrum in the unlicensed bands to provide service to its customers – primarily in the 2.4 and 5 GHz bands. Use of these unlicensed bands has allowed the Company to successfully deploy Internet services. Using these bands, GeoLinks would be able to offer high-speed broadband in Phase II Auction eligible census blocks and the encompassing census block groups. However, allowing Phase II Auction awardees the opportunity to also obtain *dedicated* spectrum resources with which to serve these eligible areas would further leverage Phase II Auction funding.

As an initial matter, dedicated spectrum resources would allow awardees the option to offer robust point-to-multipoint ("P2MP") services, which create opportunities to connect multiple users in a more cost-effective manner (even if miles apart). For unserved, rural areas, P2MP service options are ideal, requiring fewer towers, less equipment, and no need for costly, time-consuming and disruptive construction to connect each home, business or school. In addition, access to dedicated spectrum creates regulatory certainty, which is imperative to spur investment in robust P2MP networks and equipment.

Accordingly, GeoLinks urges the Commission to recognize the value of dedicated spectrum resources for new broadband technology offerings and to craft a spectrum licensing regime associated with the Phase II Auction. Specifically, GeoLinks suggests either a "light

licensed” approach or licensing under Part 101 of the Commission’s Rules³ in any or all of the following bands: 3550-3700 MHz, 3700-4200 MHz, 6000-7000 MHz, or the TV Whitespace bands.⁴ Whichever spectrum allocation method the Commission selects, GeoLinks asserts that any amount allocated must be sufficient enough to allow for gigabit plus capacity. In addition, these bands should be regulated to keep them free from unauthorized use and interference to ensure the highest quality of service. Moreover, GeoLinks supports spectrum license periods and renewal options that allow for investment in the equipment necessary to utilize them.⁵

III. CONCLUSION

In conclusion, GeoLinks urges the Commission to develop rules of the Phase II Auction in ways that will provide the greatest benefit to unserved, rural areas. Specifically, GeoLinks urges the Commission to maintain coverage requirements to avoid stifling the auction process and create spectrum policy that allows Phase II Auction awardees the option to obtain dedicate spectrum in the award areas.

Sincerely,

/s/

Skyler Ditchfield
Chief Executive Officer
California Internet, L.P. DBA GeoLinks

³ See Petition for Rulemaking filed by the Broadband Access Coalition, RM-11791 (filed June 21, 2017);

⁴ GeoLinks also supports a spectrum sharing approach, where appropriate.

⁵ With any licensing approach, license renewals and lease extensions/renewals must be inferred to create regulatory certainty and promote investment.