

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

In the Matter of)	
)	
Expanding Flexible Use in Mid-Band)	GN Docket No. 17-183
Spectrum Between 3.7 and 24 GHz)	
)	

REPLY COMMENTS OF CALIFORNIA INTERNET, L.P. DBA GEOLINKS

California Internet, L.P. dba GeoLinks, LLC (“GeoLinks” or the “Company”) submits these reply comments in response to certain comments filed on the Notice of Inquiry (“NOI”) issued August 3, 2017 in the aforementioned docket.

Additional flexible access to mid-band spectrum would allow broadband providers to leverage wireless technologies to fill the gaps in the current broadband landscape. Fixed wireless technologies offer new opportunities to connect rural and unserved communities and offer competitive alternatives to incumbent providers in urban settings. GeoLinks submits these reply comments to provide input on potential opportunities for additional flexible access to mid-band spectrum.

I. DISCUSSION

A. Rules for the 3.7-4.2 GHz Band Should Be Changed to Promote Point-to-Multipoint Wireless Broadband Service

As explained in its opening comments, GeoLinks urges the Commission to structure a flexible use regime that will allow small and mid-sized wireless broadband providers to utilize mid-band spectrum for point-to-multipoint (“P2MP”) wireless broadband service. As commenters explain, the 3.7–4.2 GHz band is especially well-suited to support P2MP broadband access.¹ However, rule changes are needed to allow for this type of use in the 3.7-4.2 band.

¹ See Comments of the Broadband Access Coalition (“BAC”), GN Docket No. 17-183 (filed Oct. 2, 2017) (“BAC Comments”), at 1. See also Comments of Google LLC and Alphabet Access, GN Docket No. 17-183 (filed Oct. 2, 2017) (“Google Comments”), at 2.

GeoLinks agrees with commenters that the Commission should change its “full-band, full-arc” policy for licensing satellite earth stations.² As Microsoft states, the Commission “should initiate a process to update its rules regarding FSS earth stations so that they are protected only to the extent necessary to protect them from receiving harmful interference.”³ More specifically, GeoLinks supports the BAC’s recommendation that the Commission could “modify its rules to permit FSS operators to retain their current licenses to operate across the entire 3700 – 4200 MHz band, but limit interference protection to the frequencies on which the earth station is actually operating at a given time.”⁴ GeoLinks also supports commenters’ recommendation to clean up the FSS database.⁵ If the database does reflect FSS earth stations that were never built or no longer exist, as asserted by several commenters, failure to update the information only serves to further limit use of the 3.7-4.2 GHz band.

B. The 3.7-4.2 GHz band Should Not Be Reserved for Mobile Wireless Use Only

GeoLinks disagrees with commenters that advocate that the 3.7-4.2 GHz band should be solely allocated for mobile wireless broadband use.⁶ As an initial matter, GeoLinks fails to see how this type of allocation would help meet the Commission’s goals of expanding broadband deployment to unconnected Americans (especially in rural areas). As GeoLinks explains in its opening comments, P2MP connections offered via fixed wireless broadband service create opportunities to connect multiple users from one transmission point. With the appropriate spectrum allocation, fixed wireless providers can offer up to Gigabit+ P2MP connections of

² See Comments of Microsoft Corporation, GN Docket No. 17-183 (filed Oct. 2, 2017) (“Microsoft Comments”), at 3. See also BAC Comments at 8, and Comments of Verizon, GN Docket No. 17-183 (filed Oct. 2, 2017) (“Verizon Comments”), at 12.

³ Microsoft Comments at 3.

⁴ BAC Comments at 8.

⁵ See Google Comments at 4-5 and Microsoft Comments at 3-4.

⁶ Comments of T-Mobile USA, Inc., GN Docket No. 17-183 (filed Oct. 2, 2017) (“T-Mobile Comments”), at 7. See Comments of CTIA, GN Docket No. 17-183 (filed Oct. 2, 2017) (“CTIA Comments”) at 6.

identical quality to fiber connections for a fraction of the cost.⁷ This is something that cannot yet be accomplished over mobile broadband connections.

Additionally, allocation of this band for mobile wireless providers may not provide an immediate benefit to consumers like allocation for P2MP services would. T-Mobile states in its comments that designation of the 3.7-4.2 GHz band for mobile broadband would “complement wireless carriers’ use of spectrum in adjacent bands.”⁸ T-Mobile further states that some of this adjacent band spectrum “may be made available in the future.”⁹ Moreover, Verizon explains that this band “can support the high bandwidth carriers required for data-heavy 5G services”¹⁰ – a future technology that is still years from full deployment. While adjacent bands do promote efficiencies, the efficiencies touted by certain commenters are too forward looking to base spectrum policy for this band on at this time. A policy of setting aside rare spectrum resources for prospective purposes when they could be utilized immediately to connect underserved areas promotes inefficiency and runs contrary to the Commission’s goals of closing the digital divide. Instead, GeoLinks urges the Commission to create spectrum sharing policies for this band that will promote the deployment of highspeed P2MP broadband services.

C. An Auction Mechanism is Not Appropriate for Mid-Band Spectrum

Some commenters advocate that spectrum licenses in the mid-band should be offered via an incentive auction.¹¹ While auctions are effective for some spectrum bands, GeoLinks maintains its position that an auction mechanism is not appropriate for mid-band spectrum. First, incentive auctions tend to only benefit large companies with large amounts of capital to spend. Small to mid-sized fixed wireless providers have the potential to offer highspeed broadband services that can meet the Commission’s speed and deployment goals for a fraction of the cost of traditional, fiber-based service providers. Therefore, GeoLinks emphasizes that any spectrum licenses granted in the mid-band spectrum should be granted on a basis that will allow these

⁷ Specifically, spectrum allocation of at least 250 MHz in the mid-band would be ideal for these connections.

⁸ T-Mobile Comments at 10.

⁹ *Id.*

¹⁰ Verizon Comments at 14.

¹¹ *See* CTIA Comments at 5. *See, generally*, T-Mobile Comments.

companies to obtain and utilize them. Second, as discussed above, auctions incentivize bidders to purchase spectrum resources as an asset for future use rather than for immediate use.¹² To meet the Commission's broadband deployment goals, spectrum policies should be developed in a way that promotes connectivity immediately.

GeoLinks urges the Commission to grant spectrum licenses for the mid-band in a way that immediately promotes efficient use and deployment of highspeed broadband services. Specifically, GeoLinks urges the Commission to use a "light licensed" or Part 101-type licensing structure, especially with respect to the 3.7-4.2 GHz band.

II. CONCLUSION

In conclusion, GeoLinks urges the Commission to develop spectrum policy for the mid-band spectrum that allows for the effective deployment of P2MP wireless broadband technologies.

Respectfully submitted,

GEOLINKS, LLC

/s/ Skyler Ditchfield, Chief Executive Officer

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

¹² See FN 9, *supra*.