



December 20, 2017

To Whom It May Concern:

I am writing on behalf of my company, Alsat Wireless regarding the proposed changes to the CBRS band found in the NPRM dated October 24, 2017.

We are a Wireless Internet Service Provider (WISP) based in Central Missouri, providing High Speed Internet services to 550 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 have service plans ranging from 1.5 Mbps to 10 Mbps. We recently began investing in advanced wireless equipment to increase our existing speed packages to 3 Mbps to 25 Mbps. One of those technologies are LTE, using the existing 3.650-3.700 MHz. To date, we have made investments in equipment for this band well more than \$135,000 over the past 2 years, with plans to invest at least that much more in the next 12-18 months. For a company our size, this is a very substantial investment.

The primary reason for the investment in this technology was the introduction of the CBRS rules that were adopted in April of 2015.. The benefits of having an additional 100 MHz of spectrum for our LTE service is huge. Not only will it allow us to offer higher speeds to our customers, it will help eliminate interference and will allow us to deploy the technology in more areas.

The idea of the FCC entertaining the idea of making changes to the CBRS band at this point is very disappointing. A significant benefit of the 2015 rules was the PAL licenses based upon census tracts. We were very excited about the PAL licenses as we could purchase them within our coverage areas, and that they would be affordable due to the small size. We feel that expanding the geographic area of a PAL will limit our ability to participate, as the costs associated with acquiring a PAL will increase drastically as well, pricing everyone except large mobile carriers out of the market. We already provide services to areas that telecoms and cable will not invest money to provide service in, and are very willing to expand and invest more, provided the opportunity is there to do so. In my opinion, innovation and creative thinking is what is going to solve the internet divide with Rural America. The 2015 rules were both very creative and innovative in the way they allowed smaller companies to participate in the PAL licenses. Changing them at this point will be very detrimental to providing services to Rural America in a timely manner.

As you can probably tell, we are very much opposed the proposed changes. I am very sure that our customers would agree, knowing how adversely these changes would affect them. Our rural customers deserve to have the choice of providers just like those in larger population areas. Please allow us to continue to give them that choice by saying NO to the proposed changes.

Sincerely,

Alan Luelf, General Manager
Alsat Wireless