

Dear Chairman Pai and Commissioners,

Good afternoon.

My name is Bill Shillito. I and my business partner Joshua Strickland started our WISP in Hickory, NC in 2003. The WISP is North Carolina Wireless, LLC.

We have seen and worked thru many changes in the market. One of the most remarkable changes is the lowering of cost to provide service to un-served or underserved areas in rural NC.

This cost reduction has come about by our hard-work. We endeavored to understand how to extend coverage on a shoe-string budget. We had to. We learned by hard knocks.

At the same time, we met with, worked with and planned with many local governments, County and City. Out of those discussions and plans, we have developed a method to deliver service at a remarkable cost savings over other methods.

One of the constraints that we have learned to work with is Frequency Allocation. This constraint is currently the most daunting one we face. The CBRS rules released in 2015 prompted us to invest in the 3-gig technology. We made a substantial investment based on this technology and the belief that the frequency bands would be available to support our growing client base. If you take any action that makes these frequencies more difficult or impossible for us to access, you will hurt our efforts. We oppose both the increase size of PALs and lengthening the term of licenses. These steps hurt our efforts.

Currently we serve all or parts of 7 counties out of 100 counties in NC. Recently we partnered with a County Government whereby they constructed four (300') public safety towers, with the explicate agreement that we could and would operate a commercial Broadband Internet service from those towers. The County also provided matching funds to increase our incentive to participate. No other provider stepped forward to partner with this County to undertake this effort. We are currently in beta with 5 clients. We anticipate bringing on

400+ rural homes in the next 12 months. Our very best technology to reach them is our 3650-3700 MHz offering. At our beta sites, we are pushing 30+ mb/s to these homes. One of the homes is 6.8 miles from the Access Point.

The cost and risk both operationally and financially are huge barriers to attracting providers like us. If you add the burden of high-cost of frequencies, or auction those frequencies so that they are not available to WISP like North Carolina Wireless, you will doom NC citizens in rural and low population density areas to remain under served or unserved status for a long time.

My plea is to keep these frequencies available to innovative organizations (WISPs) to continue to expand coverage and use this technology in unique and ever cost reducing methods.

Thank you,

Sincerely,



William (Bill) L. Shillito



Joshua Strickland