

To Chairman Pai, Commissioner O'Reilly and the Federal Communications Commission:

We are a small WISP startup in the State of Wisconsin that provides critically needed broadband access to rural families, businesses, local municipal governments as well as voice communications.

The areas we serve are primarily in the northern part of Washington County, expanding into Fond du lac and Ozaukee counties. We pride ourselves on offering a reasonably cost effective service of \$50 a month for 50 MB/s.

When the new CBRS rules were announced 2 years ago, we saw immediately potential in rural areas. Accompanied by the products that followed the release of the new rules, we immediately set our eyes on providing an affordable NLOS internet service to those who could not get anything else. We are currently in the process of purchasing both a 3.65ghz license as well as LTE base stations in order to take advantage of this opportunity, however the proposed rule changes made by T-Mobile / CTIA and others would pose a significant threat to our business, such that we are now hesitant to continue with our acquisition of licensing.

Our network works by starting our main POP in an area with relatively adequate broadband options, engaging multiple transport providers in those areas to get us our upstream connection, and then building out our own wireless and wireline infrastructure to expand into rural regions. Under the Census tract model, it is very conceivable that we could purchase several PAL licenses within our coverage area, near the northern part of Washington County, however, under the proposed "PEA" plan, our coverage area becomes part of the same PEA that encompasses the state's largest city, and the entirety of the state's most populous county, which is not an area that we even provide service to at this moment in time.

This would, once again, result in hundreds of Wisconsin families going without access to homework and schooling resources, businesses not being able to get the broadband access they desperately need to improve the economic situation in our state and promote job growth, prevent work at home opportunities from being a reality of any kind to those who desperately need it, prevent municipal governments and public safety from being able to do their job due to poor critical communications infrastructure and place us, as a small internet service provider trying to provide competition in a free market, in the same place we end up time and time again.... at a regulatory disadvantage to large telcos and cell companies.

On top of all of this, it is practically unheard of, and extremely poor practice to modify rules which were decided on a mere two years ago, and which haven't even had the time to become fully implemented yet. If T-Mobile and CTIA wanted to argue their case on why the CBRS rules should be modified, they should have done so before thousands of businesses invested their hard earned money into technology to improve the lives of our customers and neighbors. By moving the goalposts this late in the game, the FCC risks putting the same type of small providers that the Chairman grew up with as a child in India out of business in one fell swoop, leaving the cell phone companies to take advantage of the consumers

with excessively high rates and excessively low data caps as they always do.

In closing, the original CBRS rules were an excellent new and innovative regulatory design, handling interference in an egalitarian fashion and providing enough spectrum and small enough regions for PALs that the free market could function and the only limiting regulatory burden was "may the best man win" - an idea that truly has the potential to usher in a whole new era of sustainable and diversified broadband growth in rural America.

Myself, WISPA, my company, and many of our peers in the industry fear that if any of the proposed changes to CBRS go through, it could not only set us back to square one, but potentially set everyone back even further, as projected value that was counted on when purchasing licenses and equipment simply vaporizes into thin air at the expense of not only ourselves as operators, but at the expense of the American citizens as well.

Thank you for hearing our comments, as well as those of WISPA and our many peers. We hope that you will continue to make the right choices, as we have seen you do throughout Chairman Pai's tenure as Chairman.

- Riley Flaherty,  
President / CTO  
Hexis Internet