



December 27, 2017

To: Federal Communications Commission

Reg: Proceedings 17-258

Dear FCC Commissioners,

My name is Casey Imgarten and I am the owner of AirLink Rural Broadband Services located in Salisbury, MO. I formed Airlink Rural Broadband in 2010 with my own investments because my rural community had minimal access to broadband services. Today my company serves more than 1700 rural customers spread over 5+ counties in Mid - Missouri. We currently offer high speed broadband services to both residential and business customers ranging from 3 Mbps to 100 Mbps. More information pertaining to my company can be accessed at www.airlink123.com.

After the CBRS rules were adopted in 2015, my company began planning and investing in hardware and infrastructure operating in band 42/43. Today we have 21 eNBs in operation currently servicing 300+ rural customers whom we were unable to provide services to in the 5ghz band. We have 28 eNBs purchased and plan to deploy them in 2018. The 42/43 band has been an important asset in our growth and ability to serve rural Missouri customers.

The proposed rule changes will significantly reduce Airlink's ability to participate in the auction and significantly reduce our ability to serve rural customers. If the FCC was to change the existing rules to conduct PAL auctions based on PEAs, Airlink would not be able to compete with the large telco companies.

Please do not use PEAs as a basis for geographical areas for the PAL auctions. Census tracts are much smaller and would enable us to participate in the PAL auctions and continue rapidly deploying new services to the rural areas of Mid - Missouri. The FCC's website lists four strategic goals which need to be followed. In our opinion, the 2015 CBRS Rules embraces every one of these goals. However, changing the PAL rules DOES NOT meet these goals. We encourage each Commissioner to read and reflect upon these strategic goals as you make your decisions on this NPRM. **Promoting Economic Growth and**



**National Leadership - Protecting Public Interest Goals - Making Networks Work for Everyone -
Promoting Operational Excellence**

Thank you,

Casey Imgarten, Owner AirLink Rural Broadband