



December 27, 2017

To whom it may concern:

Q-Wireless, LLC is a Wireless Internet Service Provider (WISP) serving approximately 2,700 customers, primarily in rural Western Kentucky. Our focus is on underserved, unincorporated areas, or small (<5,000) population centers, incorporated or not, that lack reliable wired broadband services. We have worked in partnership with local county governments since 2007 to provide such services, and have relied increasingly on customer-serving equipment in the 3.65GHz spectrum to offer broadband download speeds up to 12Mbps to our customers, with faster packages being planned.

We are writing to express serious concerns about proposed changes to the Citizens Broadband Radio Service (CBRS) that would specifically affect the 3550-3700 spectrum and impact our ability to provide rural broadband services in a very negative fashion.

To date, we have deployed 20 sites that utilize 3.65GHz equipment to provide end-user broadband services, 18 of which serve, in whole or in part, unincorporated rural areas. We have plans to deploy, at a minimum, another 6-10 sites in the first half of 2018 alone. All told, these sites represent investments of private capital totaling approximately \$200,000, with another \$30,000-60,000 already planned.

We have found the 3.65GHz to be of vital importance to our business – not just its success, but possibly its very survival. Usable unlicensed spectrum has become so saturated as to now be impractical in many areas, and licensed spectrum has proven cost-prohibitive for a company our size. With that, we have begun to shift more end-user services to the 3.65GHz spectrum since the adoption of CBRS rules in 2015.

We must express strong opposition to proposals on GN Docket No. 17-258 that would fundamentally change the CBRS. Most specifically:

- The proposal to conduct PAL auctions based on PEAs or other geographic areas larger than census tracts

This proposal stands to not only make the cost of spectrum increase significantly because of the increase in size of the area specified in a given auction, likely making it cost-prohibitive for providers such as Q-Wireless to purchase spectrum, it will also force bids on areas beyond those a small provider can reasonably cover. This will effectively price providers of our size out of the market. As the accompanying map shows, our deployments already exist in two PEAs, though our network still leaves much of the PEA we're primarily in untouched. This illustrates the problem with using a relatively large geographic area for PAL auctions, as we would be forced to pay a premium to bid on areas we cannot reach from our network.

- The proposal to extend PAL terms from 3 years to 10 years, adding "renewal expectancy"

This would, in effect, make PALs essentially perpetual, meaning that smaller providers – who are already challenged in bidding against much larger competitors who lack local focus – could be permanently locked out of needed spectrum.

Local providers put emphasis on unserved rural areas that larger companies find impractical to invest in, but access to usable spectrum is essential to doing so. Cost-effective access to spectrum will allow continued investment and growth, and use of the full 3550-3700 spectrum is of the utmost importance to businesses like ours as we continue investing in providing rural broadband to underserved areas.

Thank you.

