



December 21, 2017

Bolt Internet
600 E. Gurley St, Suite E
Prescott, AZ 86301

To whom it may concern,

Concerning FCC Proceedings: 17-258

I am writing as a representative of Bolt Internet Inc., an employee owned company. This letter concerns proposed rule changes of the CBRS bands.

We are a wireless internet service provider based in Prescott, AZ. Our coverage area is most of Yavapai County, AZ, which consists of 8,128 square miles. We have more than 800 subscribers in this area that range from 3 Mbps to 90 Mbps. Our coverage area consists mainly of small towns fewer than 50,000 people. These towns have DSL, cable, satellite, and cell providers. Most these providers have extensive holes in their service coverage. This is where we are concentrating our efforts to bring quality internet service to those who are under served. See last page for a current coverage map of our area in AZ.

We received our 3650-3700 call sign on May 3rd, 2011 after we completed an employee buyout of Bulleri Networks. We quickly began deployment in this band and now have one of the largest 3650 deployments in the state of Arizona. We have made substantial investments in this band over the last six years, and the current CBRS rules are vital to our existence and plans for expansion. To provide more bandwidth in the future we have begun to invest in more fiber to our sites so we can handle future demand. We have started deploying the new more expensive CBRS compliant devices and are currently looking at the new LTE and 5G solutions. We are planning to back fill our network with the most resilient choice we can find over the next 5 to 7 years to provide this area the best service possible. If the Pal licenses are expanded from census tract to PEA size it will severely limit our ability to reach all customers due to skyrocketing overhead. Our area has always been a black hole to the cell phone companies who only want to cover the metro Phoenix area. Our current PEA is absolutely huge and covers nearly a quarter of the state yet it also includes some of the Phoenix's northern Suburbs. Which may mean a large carrier will purchase this PEA and 75 to 80 percent of our PEA will not have availability to this frequency. Due to the fact large carriers will buy it and only use it for the metro areas of the state. As part of this, if you extend this to a 10 year license, it will not be reviewed until that time and you are suggesting giving them an automatic renewal at this point so they can shut small providers out. If you leave the PAL areas small, the small carriers such as us, that need the frequency, can purchase these PALs and can use them. This will help stop a new situation of small carriers fighting for the scraps off the big carriers table.

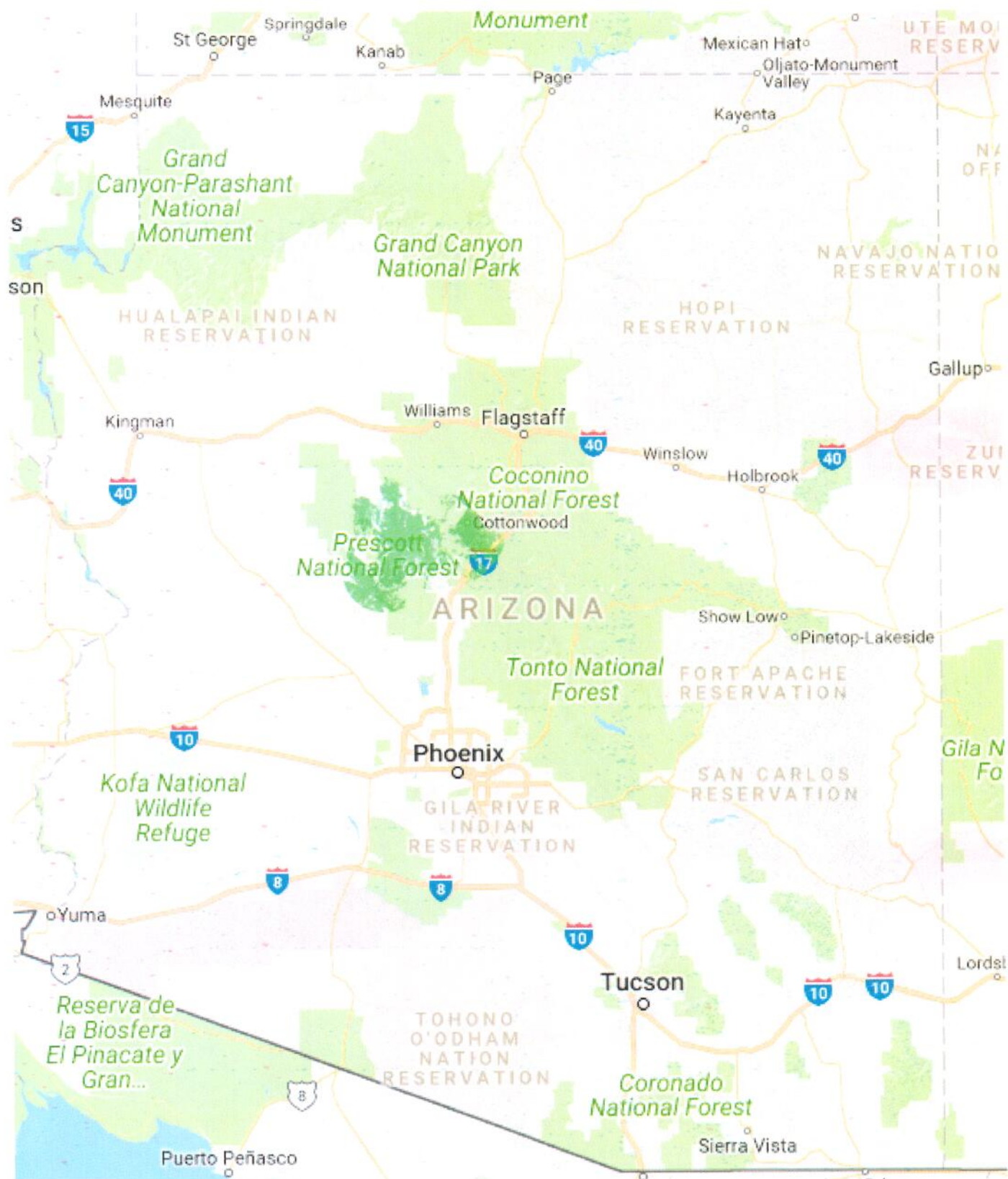
These new proposed rule changes could severely harm our ability to grow and provide faster better internet to the Yavapai county area. It could be totally devastating to our existing small business considering our investments under the April 2015 rules and now we are being forced to hit a moving target. We strongly oppose any changes to PAL Size or length of term.

If the FCC continues on this path, it will not only be choosing the winners but, it will certainly be choosing the survivors as well and this could prove to be one of the world's best mouse traps for destroying small businesses. Small WISPs in April 2015 were enticed by the FCC saying "Here is the cheese you are looking for" and now in 2017, the FCC whisks it away after many small WISPs put in the investment that the FCC was asking for. This now results in the possibility the loss of their businesses, livelihoods and investments. Some will fail, others will survive and the big three will get bigger. The largest victim will sadly be rural America and they will be left in the forgotten internet free zones of the country. They will not only struggle to learn with no, or slow internet but, they will not be afforded the chances of remote learning because satellite will just not perform and the cellular carriers only want to increase their coverage in the big city.

Sincerely,

A handwritten signature in black ink, appearing to read 'RW Clark', written in a cursive style.

Robert W. Clark
Network Administrator / Partner
(928)717-2658



Final Congressional Districts - Approved 1/17/12

