



12/27/2017

DMCI Broadband, LLC.
PO Box 218
Hillsdale, MI 49242

Re: GN Docket No. 17-258 Promoting Investment in the 3550-3700 MHz Band.

Dear Commissioners,

DMCI Broadband is a locally owned internet service provider located in South Central Michigan. We utilize fixed wireless technology to provide service to 3,000 customers in 4 counties with broadband speed up to 50Mbps. Additionally, we deliver VOIP services to over 1,000 customers in our service area. We primarily provide service to rural areas that lack service from other providers.

Almost ½ of our current customer base is Non-Line of site from our 41 towers, therefore we provide service to those customers on sub performing 900Mhz spectrum with 1.5Mbps download speeds and older Wimax platforms. We have found that 92% of these customers can be moved and upgraded with new LTE products in the 3650MHz band.

During the last 2 years, we have invested over \$700k in LTE products that operate in the 3650-3700 with the expectation of additional spectrum from the CBRS decision outlined in 2015. We have a road map for an additional \$3.5 million in capital expenditures over the next 4 year to deliver higher bandwidth to our growing customer base. Since the PEA announcement we have dramatically slowed our purchases and deployment schedule until this issue is settled.

The proposed changes to the PEA from the Census Block model will be disastrous to DMCIBB and derail most of our planned expansion due to spectrum limitations. PEA 56 & 66 has a population base of 1.97 Million people. The Census blocks that are part of the DMCIBB footprint has less than 170 thousand people, a mere 8.6%

I respectfully request that the FCC does NOT move forward with this new PEA model. These changes would all but eliminate the smaller companies in favor of the large telco's. Under the original 2015 CBRS rules, all companies are on an equal playing field and all large or small have the opportunity to bid on this spectrum.

Thank You for your consideration.

David L. Cleveland
Managing Partner
DMCI Broadband, LLC.