



December 27, 2017

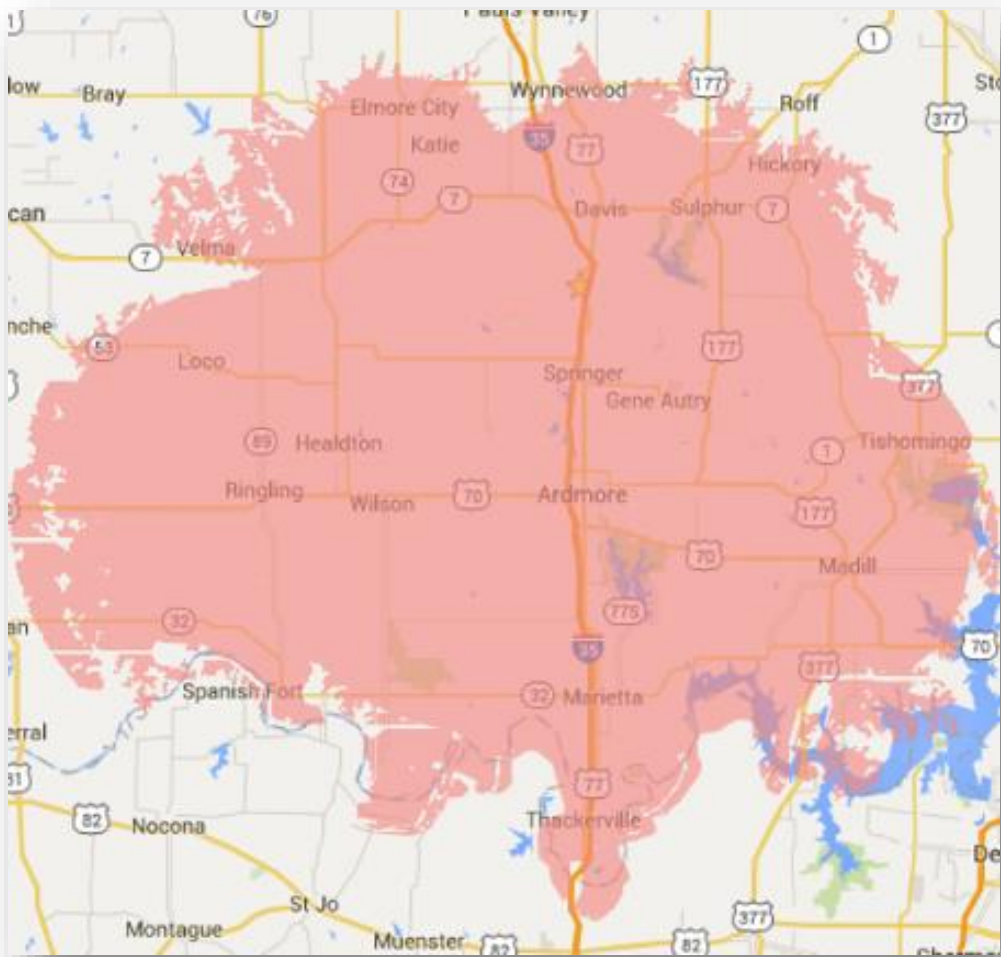
Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Regarding Docket No. 17-258 – Promoting Investment in the 3550-3700 MHz Band

Dear Ms. Dortch:

I am writing these comments on behalf of our company Arbuckle Communications, LLC and the businesses and residents of Southern Oklahoma currently using our service. Arbuckle Communications is a Fixed Wireless Internet Service Provider located in Southern Oklahoma that has been deeply rooted in our communities since we were originally founded in 1931. Throughout the many years of providing products and services to businesses and residents in our area, we have adapted our product offerings to stay relevant to our customers' needs over time. Our coverage area encompasses over 6,000 square miles and provides service to many customers that, without us, would not have any other options for quality Internet access. We currently serve nearly 4,000 business and residential customers and have plans to extend our network and continue to grow. Our network is currently able to deliver speeds up to 100Mb on a dedicated bandwidth plan while our standard residential and business packages can deliver 20Mb download with the ability to burst up to 50Mb. We do all of this while providing our customers with a very competitive monthly price that includes unlimited data usage and no contracts.

Arbuckle Communications Network Coverage



This is one of those times when rural America needs your help at the FCC to enable us at Arbuckle Communications to provide voice and data solutions that are desperately needed. We urge you to rule favorably for rural America by not conducting PAL auctions based on Partial Economic Areas that are only friendly to the national mobile carriers. We are in favor of the PAL auctions being divided up according to census tracts as originally adopted by the FCC in April 2015 to establish the CBRS band.

Our company was one of the early adopters of the 3650-3700 MHz band and we were granted our license from the FCC on January 19, 2011. Since that time, we have utilized this 50 MHz to provide voice and data services to consumers that live in very rural and underserved markets. As of December 7, 2017, we are currently using this spectrum to provide last-mile service to 1,368 customers. This represents thirty-eight percent of our entire customer base. We actively manage 70 Cambium Networks PMP 450 3 GHz Access Points to provide these services to consumers. Since receiving our license from the FCC in 2011 we have invested nearly one-million dollars of our own capital in this band. We believe that small business can and will continue to play an important role in delivering last-mile service to consumers of the larger broadband industry.

As you already know, the FCC adopted the rules in 2015 to establish the CBRS band. This CBRS band has been viewed as an “innovation band” that would enable competition of many business models including Fixed Wireless Providers like us. When those rules were established in 2015 our small business committed to aggressively investing in the CBRS band with the understanding and hope that larger channel sizes would eventually become an option for us to provide to consumers. The Cambium Networks PMP 450 3 GHz Access Points that we have currently deployed on our network can immediately benefit from the additional spectrum of 100 MHz we would be bidding on according to the 2015 CBRS rules because it can use a frequency range between 3550 – 3800 MHz. Their equipment is also software upgradable to support larger channel sizes up to 40 MHz (See Attached Exhibit A). The census tract PAL sizes would also allow us the opportunity to make a competitive bid that would encompass our existing network immediately allowing our rural and underserved customers in Southern Oklahoma faster data packages and throughput. I cannot begin to express to you how effective an additional 100 MHz of licensed spectrum would benefit our customers and rural southern Oklahoma. We have been able to connect nearly 1,400 rural customers to broadband access, but it has had it’s share of challenges along the way. The 50 MHz of frequency in the GAA is extremely congested and noisy. We are sharing spectrum with other Fixed Wireless Providers as well as local utility companies and cooperatives that are using the GAA. The channel sizes we can successfully use range anywhere from 7 MHz to 20 MHz depending on how much clean spectrum in the GAA we can find. A vote to allow us the use of licensed spectrum is a vote for rural America.

In conclusion, rural American consumers deserve the same quality voice and data services that are available to those in urban and more densely populated areas. When the FCC correctly established the 2015 CBRS rules a clear message was sent to consumers in rural America that we have not forgotten about you in Washington, D.C. We applaud the original rules that were established at that time. We adamantly oppose any changes you would consider regarding the CBRS band. When you vote in favor of census tract PAL sizes and small business and innovation, consumers in rural America will benefit immediately. Don’t change the rules at the last minute to favor the big carriers that are members of the CTIA and T-Mobile. Keep the rules as they are now which are favorable for consumers, small business, and continued growth of rural broadband.

Listed below are a few of our customers from various parts of Southern Oklahoma. We simply sent an email to them stating the need for the FCC to hear from them advocating the reasons why their Internet service, provided by Arbuckle Communications, was important to them. I encourage each voting FCC member to read these comments listed below. Your vote to not amend the 2015 CBRS rules is a vote for rural America consumers.

Sincerely,

A handwritten signature in black ink, appearing to read "D. S. Pope".

Duane Scott Pope

Network and Operations Officer
Arbuckle Communications, LLC
601 A ST SE
Ardmore, OK 73401
www.arbucklecomm.com

Customer Testimonials

Arbuckle Communications is the only real provider of broadband internet in my area. Satellite companies offer broadband service, but they limit their customer in their usage, charge higher rates, and are less dependable. The internet is how I order all my medicines, get the latest news and weather, pay nearly all my bills, access my credit cards, do my banking, buy most of my clothes, tractor parts, automotive parts, computer parts, and anything else that I cannot find locally in a timely manner. The internet is how I teach myself to build or repair nearly anything I care to attempt. The internet is a tool that is only limited by a person's imagination and knowledge of its use. Arbuckle Communications has kept the service up and running smoothly probably better than 99% of the time. With AT&T announcing layoffs of 80,000 in the next 5 years, their wanting to get out of rural areas and abandoning of landlines, Arbuckle Communications becomes more important to the rural customers they serve. Without companies like Arbuckle Communications to provide broadband service, the rural areas are pushed backward in time and their properties are devalued because of their lack of internet access.

RL Rushing – Madill, OK

Living in such a rural area makes it tough to get a strong internet signal. Other than one upgrade in 6 years of service with Arbuckle Communications, I've always had great, fast, reliable service. Thanks so much for always working hard to provide us with such great service.

Naomi Warner – Burneyville, OK

Arbuckle Communications provides a most valuable and needed service to us rural customers that is not available in any other means. Before contacting them, I asked the local 'land line' provider for help (fiber optic service) and they responded with the ability to provide 'dial up'. Please allow Arbuckle to do whatever is necessary to improve their much-needed network.

Randy McWright – Loco, OK

Thanks to the great service Arbuckle Communications provides, I can connect to the internet and work from my home. This is quite important to me as I live in a part of Oklahoma not served by DSL connectivity nor cable internet. Arbuckle Communications has proved the perfect solution. In addition to allowing me to connect securely to my employer's servers nationwide, it also supports my family's entertainment via Netflix and other streaming services, as well as access to on-line news, shopping, and social media. Arbuckle Communications provides me with a reliable, cost effective, unlimited high-speed internet service that I need. The other types of internet available here, satellite and wireless phone, are not cost effective due to prohibitively expensive data rates, and other technical issues. Use of wireless phone for data is also dependent on signal strength, which is not good in many areas here. Many thanks for being here for us!

Mary Eybs – Thackerville, OK

Arbuckle Communications continues to provide a wonderful service to the rural areas of Southern Oklahoma, where quality internet service is difficult to obtain. In my years as an Arbuckle Communications customer, I have not experienced any problems or had any complaints about the internet service or customer service I have received. Their service allows me and my small family to communicate with others, stay current on information, run our family business, and keep ourselves safe during times of severe weather in Oklahoma. Their service is also very affordable. We are grateful for the service they continue to provide.

Hope M. Robbins – Ringling, OK

Dear FCC, I hope you realize how important it is for rural families and businesses to have quality access to wireless internet. My family owns and operates Double C Cattle Co. In Murray County and live in a very remote location. So remote that neither UPS or FedEx will deliver to us. We run 1000 cows and manage over 30,000 acres and WIFI is a critical method of communicating for our business and individual lives. We don't even have access to a phone line due because of our remote location. Four families live on our property, all with wireless service through Arbuckle Communications as well as our Ranch Office. We also have a 100MW wind farm on the property and wireless service provided by Arbuckle Communications is a necessity for their operations as well.

Thank you for your consideration,

Chuck Coffey – Double C Cattle Co – Edgerock LLC – Springer, OK

We have been customers of Arbuckle Online of Southern Oklahoma for more than 12 years. They have been there when no one else was. Their customer support never fails, and I do not know what we would do without them.

Marilyn and Oscar Edwards – Marietta, OK

Arbuckle Communications is a valuable resource in our home. On a personal level, I pay all my bills online, communicate with friends and family daily, and use the internet for information and entertainment. My husband is self-employed. I renew all his licenses and registrations online which saves me a great deal of time and effort. My daughter is a full-time college student living at home. She would not be able to turn in assignments and projects without the internet service provided by Arbuckle Communications. Our service is fast and reliable. We could not run our household without them.

Gael Phillips – Lone Grove, OK

We have several accounts with Arbuckle Communications. Before switching to Arbuckle, we had no choice for Internet service except satellite due to our rural location, and the comparison of services is like night and day. The satellite service was slow, became increasingly expensive, and performed poorly if a cloud was in the sky. We are a home business and use the Internet every day. After switching to Arbuckle Communications, we could not believe the difference in our Internet performance! Uploading, downloading, streaming videos, etc. are part of our daily tasks and our current Internet service provides us with everything we need. As a bonus, the staff and customer support at Arbuckle Communications are simply the best. The technicians are friendly, prompt, and value our business. They understand that time is important, and they make every effort to resolve any issues within one day, and many times the same day you call. I also appreciate their easy bill pay options with itemized email statements. Arbuckle Communications is a pleasure to do business with and we are very fortunate to have their expert technology available to us in rural Southern Oklahoma.

Brenda Buck – Buck Cattle Company – Madill, OK

Internet service in rural Garvin County is very important to us, both personally and as a small business owner. Arbuckle Communications is a very reliable source for our Internet.

Sheila Henry – Elmore City, OK

Arbuckle has been a God send for rural Marshall county. Anyone in the county or anywhere needs to use them.

Bill Bailey – Owner and Operations Manager- Little Glasses Resort and Marina – Madill, OK

I am writing on behalf of Arbuckle Communications. I have been a customer since 2012. I am very happy with the service and support I have received during that time. My husband and I use the internet constantly throughout the day. We live rural, so we do a lot of online shopping, we watch only online streaming television, we spend many hours in correspondence for business and volunteer programs we are involved in. We also do use some social media platforms. Arbuckle Communications has met our internet needs continuously, and at a very reasonable price. We use 3-5 devices at a time and very seldom have any trouble with speed. I have been with other companies and none can compare with Arbuckle. The wireless network system for those of us who choose to live rural is fantastic. Thank you.

Laurrie Austin – Ringling, OK

I have Arbuckle Communications and have had this internet service for over a year. I am beyond happy with the service I have. Having Arbuckle Communications high speed Internet has allowed me to go back to school in a master's program on line. I would have never been able to do this on dish or dial up. I don't know what I would do without it.

Stefanie Fisher – Hennepin, OK

I was the very first Arbuckle Online customer in the community of Greenville, four miles north of Marietta, OK. Having internet access for my house hold and our community is critical! We can't get any other type of internet service where we live. Arbuckle Online provides us the opportunity to have choices in entertainment and access to a wealth of knowledge the internet provides. I highly recommend Arbuckle Online for anyone wanting fast friendly service as well as a great product.

Phillip Knox – Marietta, OK

Living in rural Oklahoma and being in between 2 towns and on the border of two counties, we had very little good choices in an internet service. In the past we had 2 different companies for internet service, the first was so slow and they did not anticipate getting any new fiber lines out our way anytime soon, so even though we had internet we rarely ever used it. If I needed to look something up, I had to click on the page I needed and go make a sandwich while the page loaded and when I came back it would just be finished loading, so we really didn't use internet much back then. Then one day on the way to Ardmore I saw a sign in a neighbor's yard that said Arbuckle Online Wireless....so I called the number about the next day and they came out a few days later and got on my roof and said they can see the tower from our house roof so we should have pretty good service, well we have excellent internet service now. We simply couldn't live without our internet service, we have come very reliant on it for everyday use, for many different applications. I can say Arbuckle Communications people are very knowledgeable, courteous and dependable people, we have been very pleased for over 12 years and wouldn't change a thing!

Lorye Wells – Overbrook, OK

Fast and reliable internet service are important when living in remote areas like I do. Arbuckle Communications provides this.

Brenda Cavins – Sulphur, OK

Our business depends on having the internet. It is fast and dependable. I am very happy with the product and the service I receive any time I call.

Melinda Smith – Ardmore, OK

I moved to Mannsville (Old Town area) in 2004. The only internet service provider option at that point in time was dial up. In March of 2005, I was attempting to do my taxes online, but had to download an update. I started the download and received a notification that it would take 17 hours to complete. I did some quick research and found the only options were ATT, satellite or my current service. I was too far west for Kiamichi wireless and too far east for Arbuckle Communications wireless. I was also too far away from a junction box for ATT, I would have to pay to run the cable to my house for service. I went ahead and subscribed to Wildblue. It was better than dial up, but not by much. I would run out of data after the first few days of each billing period. My kids couldn't online game with their friends, etc. I would periodically check with area wireless providers to see if I had coverage, but all to no avail. Fast forward to 2015, I happened to check Arbuckle's website and saw they had put a tower south of Mannsville. I checked and found that I could receive service at my home, so I called for installation. I love my service!! Kids can game, family can stream tv, school work can be reasonably done, online shopping or anything else we need to do online. We never run out of data and the price is very favorable when compared to satellite and the service provided. Bottom line is that we would not have any "realistic" internet service if it wasn't for Arbuckle Communications.

Allen Emery – Mannsville, OK

When you live beyond the reaches of the "cable company," and a rooftop antenna provides only 3 clear channels of TV, you do without many things. And then along comes the internet and little hope for it, until Arbuckle Communications said, "We can do that!" Thanks, Arbuckle, for original and then, updated recently, communications services. All at a reasonable cost.

Bob and Joy Pfau – Ardmore, OK

We love our Arbuckle internet. My husband works from home a big part of the year and it is VERY important to have good quality high speed internet. He works as quality control for an insurance adjusting company and must communicate information to the adjusters all during the day. We appreciate all you can do to help keep the quality Arbuckle provides now.

Vicky Tyler – Ardmore, OK

Arbuckle Communications is the best option for my family! We live out in Dickson and we didn't have very many options. But I'm so happy we chose Arbuckle! Such fast internet for a great price! Anytime we have trouble with something they're always fast, understanding and get my internet up and running in no time!

Lara Newell – Dickson, OK

Arbuckle Communications has served our needs in our community here in southern Oklahoma for several years. We are so thankful to have a company like Arbuckle serving our Internet needs. They are a family owned and operated organization that strives to take care of their customer base with affordable and reliable internet service. Without Arbuckle, folks in our area would either not have internet capabilities or the service would be so expensive only a select few would be able to afford it. We hope Arbuckle Communications can stay a strong company and serve our internet needs for years to come.

Brent Sykora – Marietta, OK

I use my computer to order online often and it is very convenient as I have little time to do all the running around I would have to do if I didn't have the benefit of the online service.

Dale Redding – Marietta, OK

We have lived in Hennepin for 6 going on 7 years and we have had several Internet Service providers, until Arbuckle Communications we were never satisfied with their service provided. So very thankful for this company and the quality of service provided.

Vickie Keith – Hennepin, OK

As an Arbuckle Communications customer, I just wanted to write and let you know just how important your internet service is to me. Living in the storm belt, and in the country where internet service is hard to get, I rely on your service to get weather updates that satellite can't provide when it's most needed. I have been extremely satisfied with the reliability of your service as outages are few and far between. Thanks again!

George Davenport – Dickson, OK

YW8 is a small non-profit organization that serves Southern Oklahoma. We were very fortunate that Arbuckle Communications was available at the time of our move to another office. Our previous provider was unable to meet our internet or phone needs at our new location. There was one other option but after much research we found that Arbuckle's telecommunication service was superior to the only other option offered in Ardmore. We have been extremely pleased with all service that we have received and look forward to any upgrades in speed that Arbuckle will be able to offer in the future.

Patty Crabtree – Office Manager – YW8, Inc. – Ardmore, OK

Arbuckle Communications is providing a vital and necessary service to us in rural Southern Oklahoma. Arbuckle Communications is the only way for our home to receive reliable Internet service. There is no DSL and no plans for it to be provided in our area. I am writing to help you know the importance of the Telecommunications products, services, and customer support that Arbuckle Communications provides to us here in Southern Oklahoma. Arbuckle Communications provides fast but more importantly, a reliable Internet access that is essential since we run a farm in this rural area and it saves us much time and money in researching repair parts or plans for farm activities since we can't travel easily to a town or city. We are grateful for the service we receive from Arbuckle; we hope to see it continue and improve in the future as technology advances and Arbuckle Communications with those advances.

Ronnie and Sherry Claxton – Overbrook, OK

I was unable to get AT&T service due to my copper line. I was informed that this problem was not going to be corrected. I am out of town and live on the land AT&T cannot make enough money by upgrading my service. I have been one of Arbuckle's customers for 10 years! Thank God for Arbuckle communications excellent service. My speed is 5 to 10 times as fast as my att. Their service is very professional. I am and will be an Arbuckle customer as long as they are available.

Jim Pumphrey – Ardmore, OK

This is the best internet service I have ever had. Living out in the country I have had satellite internet and when the weather is bad you have NO internet. Please don't take away something that is so very important to us rural customers. Thanks.

Kenny Carlile – Burneyville, OK

Arbuckle communications is the only reliable internet provider we can get at our rural location. We are so thankful that they provide this much needed service. They are very fast, reliable, and responsive.

Mitzi Boyd – Elmore City, OK

I've had the Arbuckle Communications services for over a year now and the service has been nothing but great! To go to sleep at night I watch relaxing videos to relieve my stress and I would not be able to watch them without the services of Arbuckle Communications. The services are very affordable and that is great for part-time people such as me who don't make much but still want the luxury of such services. Most of the people I know use Arbuckle Communications and are the ones who recommended me to these services and I continue to recommend them for their such affordable prices and their high-quality services.

Shelley Pense – Mannsville, OK

To whom it may concern. Arbuckle communications, and the internet service they provide, is an invaluable partner in our business. We are a rural location and have extremely poor options when it comes to internet service providers. However, when we enlisted the help of Arbuckle communications, we were very pleased with the outcome. Over the past several years, they have continued to amaze us with their fast and courteous service. If there is ever an issue, Arbuckle Communications is quick to respond and resolve. They have also been very generous when an upgrade is necessary, seamlessly installing the latest equipment with only minor inconvenience. In today's competitive hospitality business, the availability of fast and free WIFI is a given. Thanks to Arbuckle, we can confidently proclaim to have excellent WIFI for all of our guests. Our customers often comment on the quality of our internet speeds, unexpected for such a rural location. Our credit card processing and reservation system, as well as email communication and entertainment streaming all rely on Arbuckle Communications. Without their help, our business would move so slow we would struggle to stay afloat. Southern Oklahoma is our home, and we're proud and lucky to have a provider like Arbuckle Communications.

David Pfau – Owner/Innkeeper – Shiloh Morning Inn – Dickson, OK

We knew moving from the city to the country was going to mean lots of changes. We knew so many things were going to have to change. We didn't expect that finding the perfect Internet would be so hard. As a family of gamers, we knew we would have to find the best internet provider around. We tried the big-name satellite company but even their best package wouldn't let us play a smooth-running game. Then one day I saw a small yard sign about Arbuckle Communications. I told my husband about it and we looked them up. After a few days of discussing trying them out I gave them a call. I was hooked from that first phone call. The staff was honest and helpful. They explained why I was getting the issues with the satellite internet and why I would not have the same issue with their service. (I had called the satellite company many times, but they couldn't or wouldn't explain the issue). After just a few short days Arbuckle came and set up our new service and we have been in love with them for going on 5 years now. Thank you for the service we need.

Lisa Venegaz – Marietta, OK

Internet is so important to our family. We live in the country and when the storms come thru and knock out our DirecTV the Internet provided by Arbuckle Communications is a great source for updates and news on the storms. It can save our lives.

Brandon McMillin – Marietta, OK

We really appreciate your service. We live in a relatively isolated area and grateful for the ability to keep in touch. Keep up the good work, and fast service. Thank you.

Maureen Forson – Burneyville, OK

Arbuckle Communications provides a valuable needed service to southern Oklahoma residents. Their Internet service is reliable, fast, and if you ever have a problem they respond quickly. We have very few options in rural Oklahoma for internet service and Arbuckle fills that need with a high-quality product.

Randal Chambers – Marietta, OK

Please keep your service available to us and the speed is always a must!

Andrew Beasley – Wilson, OK

I have come to greatly rely on the Internet service provided by Arbuckle Communications. Before getting service from Arbuckle I was using a dial-up connection that was terribly slow. Living in the rural area that I do, I have limited options for Internet service. Arbuckle provides me a reliable and relatively fast Internet connection that I need for my business and personal use.

Buddy J Withers – Healdton, OK

I'm very happy with Arbuckle Communications. We moved to our current address 2 years ago and if Arbuckle wasn't available, our only other options would be cell phone data or satellite dish Internet both which have data caps. Arbuckle provides good speeds for rural America like where I'm located and provides good customer service and response times. Of course, I'd love to have even more bandwidth but who wouldn't? They provide enough that most all the time we can stream 2 movies on 2 devices and still be able to surf the web on 2 other devices. I pay for 10meg and most of the time I get close to that. Keep up the good work!

David Taylor – Madill, OK

To whom it may Concern; I own an insurance business and our Internet service provider is Arbuckle Communications. I don't know what we would do without the valuable service that is provided by Arbuckle in the rural areas. I really don't want to have to move my business but without reliable and fast Internet service we would not be able to operate in the capacity that we do. Please help keep rural America up to speed with Arbuckle Communications Internet service. Blessings.

Melodie Schaffer – President of Pearman Insurance – Thackerville, OK

To Whom it may concern; We have been in our current home just two years this month and Arbuckle Communications is the only internet provider that can meet our needs. Their customer service and internet speeds are just things you don't find that much anymore. We use our internet service daily throughout the day. We have two phones, a tablet and three TV's that all use it. We would not be able to complete daily tasks without Arbuckle. Please whoever is reading this "know" in southern Oklahoma they are the standard for rural service and we would be lost without them. Thank you so much, have a great day!

Hannah Langle – Overbrook, OK

Living in a remote location that does not have cable service providers, leaves us with the choice of using expensive satellite providers or the more moderately priced WIFI services provided by Arbuckle Communications. We have found Arbuckle to provide very dependable internet and phone services and are fortunate to have a viable competitor to internet services in the area. Best Regards.

Mike Collier – Burneyville, OK