

# WISP PARTNERS, INC.

*Building rural broadband*

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December 27, 2017

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

RE: Comment Regarding GN Docket 17-258, Promoting Investment in the 3550-3700 MHz Band

Dear Ms. Dortch:

Thank you for the opportunity to provide comment to the Commission regarding Citizen's Band Radio Service, the "Innovation Band".

WISP Partners is a firm dedicated to providing support to the builders of broadband services across the rural American West. Our travels during 2017 included back-highways and country roads across 27 mid-western and western states. We have experienced more than most the tribulation of rural Americans needing to close the digital divide and to onramp the Internet economy, where too-often we we're unable to obtain a 4G signal.

WISP Partners stands with the many WISP operators who are opposed to changing the size of Priority Access Licenses (PALs) from Census Tracts to Partial Economic Areas (PEAs). We believe the public interest is best served by right-sizing geographic license areas to the economic reality of diverse markets and application sets.

Wireless Internet Service Providers (WISPs), some 2,000 strong serving millions of Internet users have bridged the digital divide by about one-third using unlicensed spectrum. During the short period since the Commission previously adopted the new CBRS Rules, WISPs have densified their networks with software-licensed Long-term Evolution (LTE) radio platforms using 3650 to 3700 MHz to deliver 25/50 Mbps, and now reaching 100 Mbps to the farm. Additionally, WISPs are now able to backfill prior user demand with NLOS solutions. The Digital Divide is closing as evidenced by the recently published Form 477 data showing the reduction of approximately 400,000 CAF subsidized locations over an 18-month period.

These investments for and by rural Americans must not be left stranded. Rather, the Commission should promote WISPs with spectrum resources to accomplish more, faster. The FCC should keep the Rules as originally adopted for licensing PALs in census tract geographies. Market economies will drive spectrum aggregation more efficiently than disaggregation. After all, the "Innovation Band" is about the use case and rural Americans need broadband now.

Respectively,

A handwritten signature in blue ink, reading "Ted B. Osborn". The signature is fluid and cursive.

Ted B. Osborn