River Valley Internet services rural portions of Clinton, Lycoming, Union, Tioga and Sullivan Counties in Pennsylvania. Many of the areas that we service are underserved or not served at all by a traditional wireline carrier or even cellular carriers.

We offer speeds of up to 50 Megabits/second to these subscribers and have recently started to deploy LTE technology in the 3.65GHz band which has allowed us to begin servicing previously unserviceable customers who were behind foliage and some obstructions.

Our decision to invest heavily in equipment that works in the 3.65GHz band was based on the understanding of the CBRS rules as defined in April of 2015 – knowing we would need more spectrum than the currently available 50 MHz to continue to deliver high-speed services to these rural areas.

An expansion of the geographic areas of PALs to an area larger than a census tract will dramatically damage our ability to make competitive bids at the PAL auction because of the need to acquire a much larger PAL than is necessary to connect unconnected persons or provide better service to our current customers.

The ability to potentially get access to 100MHz of spectrum in smaller PAL areas would allow us to continue to deploy our broadband LTE network throughout rural Pennsylvania, putting private money into buying licenses only in the specific areas we need to service.

In may cases, we are the only broadband option for customers in our area. DSL has not kept up with the times and provides extremely slow speeds now allowing for video streaming, on-line work or schooling. Cable Internet is not available in many of the areas we service.

Because of the above stated items, River Valley Internet highly opposes the proposal to increase the size of PAL licenses or the proposal to lengthen the license terms.

Respectfully,

Matt Hoppes – CEO

River Valley Internet