



StraightUpNet LLC
P.O. Box 693
Amelia Courthouse, VA 23002
December 27, 2017

Marlene H. Dortch, Secretary
Federal Communication Commission
445 12th Street, SW

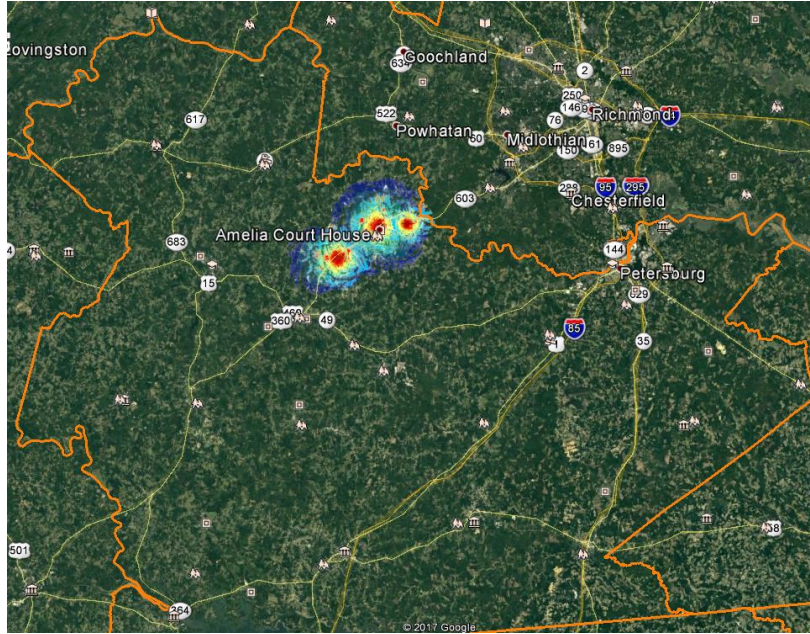
Re: GN Docket No. 17-258

My name is Mickie R. Hodges, Jr. My partner, Duncan Fung, and I officially formed our company, StraightUpNet LLC, in 2016, using our own investment capital. Over the past year, we have made huge investments in Amelia County and have true high-speed Internet service available to 30%-40% of the county citizens and businesses. We have over 1200+ potential customers on our waiting list that have a very realistic opportunity, with CBRS, to receive high-speed Internet where many of them have no other options today. Our roadmap for 2018, is to increase this investment drastically and expand our roll-out plan to a regional level. We have built our network with 95% LTE solution using the current NN License for 3.65. We see the CBRS mid-band spectrum as key to building a successful solution to service customers that generally have no other option or expensive limiting options. Our residential customers today enjoy reliable speeds as high as 25mbps.

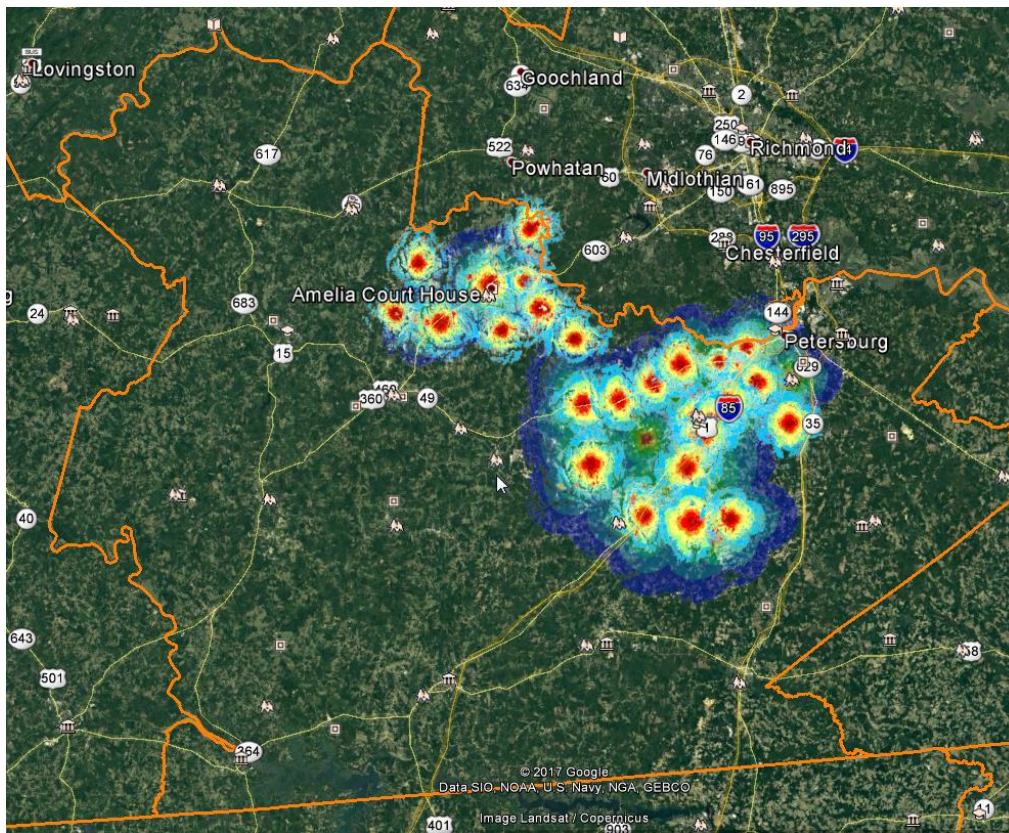
Our goal is to provide Internet service to the southern Virginia rural counties. The mission and vision are to bring premium quality high-speed broadband service, as well as other network related products and services to residential and commercial customers as a better alternative. We believe that high-speed Internet should be available regardless of where you live. We are investing in solutions, based on the current CBRS rules, that will help close the digital divide seen primarily in the rural communities. Changes to these rules would put our ability to service our customers successfully in jeopardy.

The counties we service are 70%-80% agriculture with large amounts of tree cover. This equates to residents and businesses being spread out and surrounded mostly by tree canopies. We believe and have proven that using LTE with the current NN license has been a very cost-effective approach to deliver high-speed internet to these areas. The CBRS rules as they are today will allow us to expand on this success. We, like many others, have made huge investments in the anticipation of the CBRS spectrum to allow us to provide even faster internet speeds to our customers. CBRS is not only important it is absolutely critical to our business and customers.

Below is our high-level LTE coverage is shown on the proposed PAL auction rule changes (shown in Orange outline). As you can see it encompasses at least 8 counties thus reducing our ability to effectively participate.



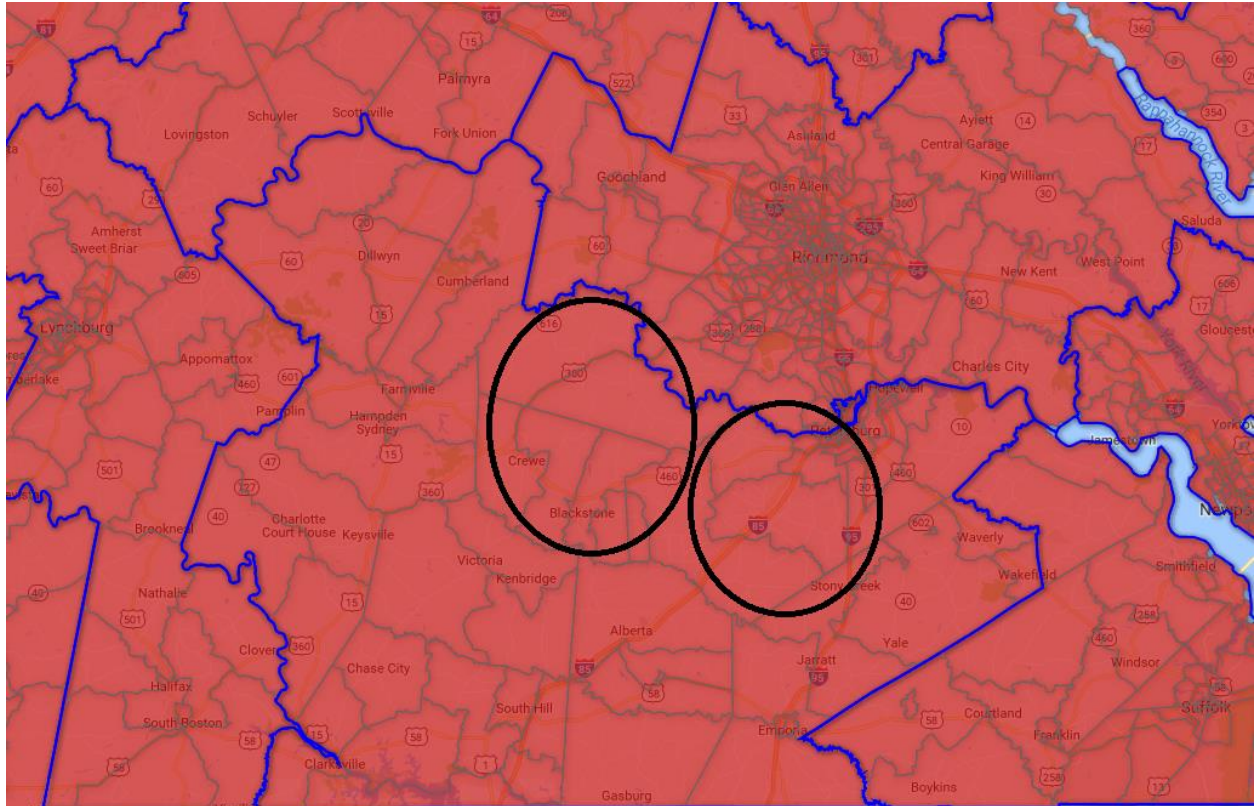
Below is our current proposed regional expansion investment. This is a very aggressive investment and expansion effort that still only covers about 15%-20% of the proposed PAL auction changes. This will not only have a negative impact on our ability to participate but will also reduce our investment capital into the actual expansion effort.





The census tract size PALs are the right size for effectively solving rural American's broadband issue. WISPs like StraightUpNet LLC. are ready, willing, and capable to deploy our networks using CBRS band to the locations where we know it is needed. Our customers, small businesses, students, work from home, and even local governments are vulnerable to the proposed changes by impacting them negatively.

Looking at the image below, the very rural areas circled are either our current coverage area or proposed areas we are investing and would very interested in bidding on PALs in southern Virginia.



The CBRS spectrum with the additional 100Mhz of the spectrum will be huge in allowing the needed capacity to continue to meet the growing demand for internet consumption. The 3.65 band currently doesn't leave a lot of spectrum to move around to avoid potential interference. Clean spectrum is critically important to StraightUpNet LLC so that we can build a fast reliable network with increased capacity.

Just to reiterate, StraightUpNet LLC opposes the proposals to increase the size of the PALs to the size of a PEA or even a county. The three-tier model is an innovative approach and allows for many networks with different use cases to be developed. GAA spectrum is critical to StraightUpNet LLC as a service provider, as well as, many other service operators of different sizes across the country.

Thank you for your consideration,

Mickie R. Hodges, Jr.
President
StraightUpNet LLC