



Via ECFS  
Marlene H. Dortch, Secretary  
Federal Communications Commission  
RE: GN Docket No. 17-258  
445 12<sup>th</sup> Street, S.W.  
Washington, D.C. 20554

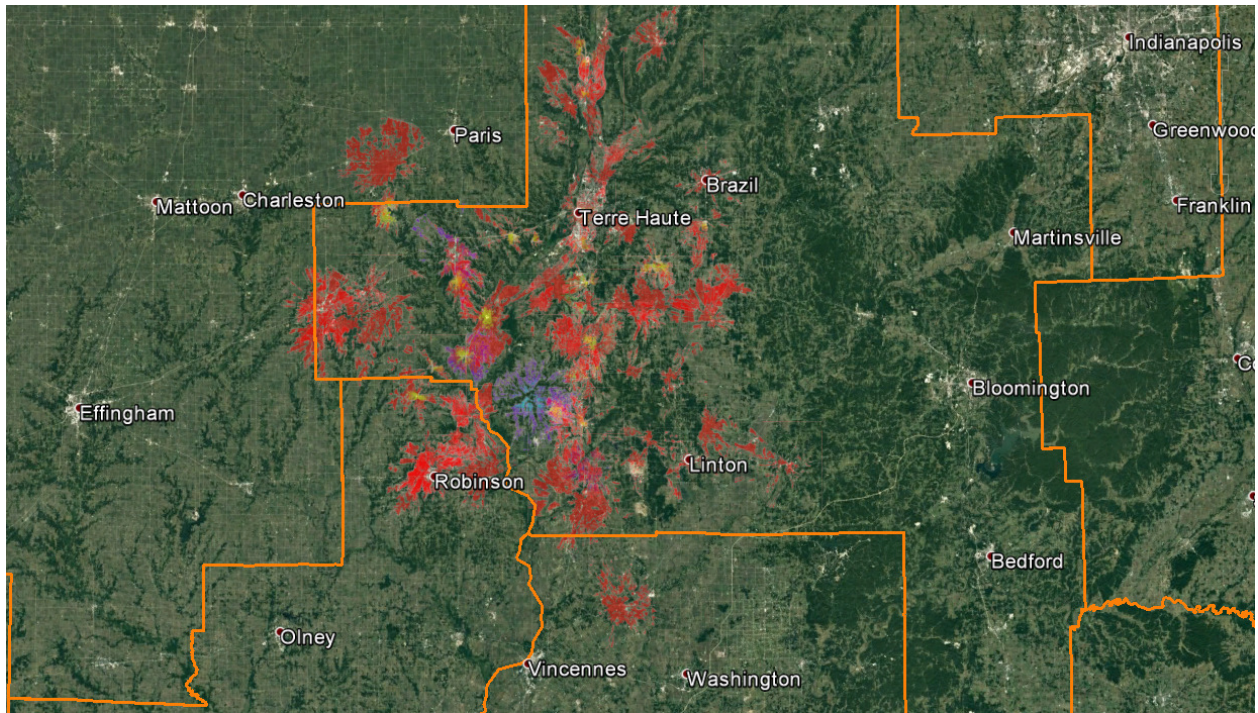
Dear Ms. Dortch:

I am writing to you on behalf of Joink, LLC, a small business operating in West-Central Indiana and East-Central Illinois. We operate as an Internet Service Provider in nine rural and low-income counties, covering approximately 1,000 square miles. We have utilized unlicensed and lightly licensed spectrum since 2001 and currently provide service to over 2,000 customers with fixed wireless connectivity.

In 2016, we began deploying LTE equipment in the 3.65-3.7GHz range that would be compatible with the CBRS rules adopted in 2015. In mid-2017, we began reducing those investments and have put a few projects on indefinite pause due to uncertainty around the CBRS rules. On our 3.65-3.7 LTE equipment, Joink currently offers speeds up to 15mbps download x 2mbps upload and expects to be able to offer speeds of 25mbps download and 3mbps upload when additional spectrum is made available. Access to additional CBRS spectrum allows us to extend our coverage by approximately 20% without additional tower structures, which will help to accelerate deployment to an underserved public. After careful review of the proposed changes from census tract to PEA (partial economic area) and increasing the license term from 3 years to 10 years, Joink strongly opposes the proposed changes.

Most of the area we serve with wireless technology is rural with approximately half of our customers having one or fewer competitive options for terrestrial broadband with download speeds over 10mbps and reasonable data caps.

This is our coverage area, along with an overlay of PEAs (partial economic areas). If we want to participate in the CBRS auction, and spectrum is sold by PEA, we would need to purchase four PEAs, which would consist of approximately half of the State of Indiana and one-third of the State of Illinois.



Like many small, regional operators, Joink has no aspirations of being a national player, or even a large regional operator. Our fixed wireless network largely exists to connect the unconnected and give those forgotten users a chance to participate in the digital economy and online educational opportunities. Having 3-year priority access licenses available on the Census Tract size is the most equitable to operators of any size as well as private industry, educational institutions, municipalities, and most importantly, citizens of both urban and rural areas.

Respectfully,

Brian Gray  
Connectivity Manager  
Joink, LLC