Broadband Corp is an Wireless Internet Service Provider (WISP) located in Central MN. We specialize in servicing in areas where traditional copper and fiber based infrastructure is not available.

We offer services in 6 counties, currently servicing over 1200 locations that include, households, businesses and government institutions. We currently are providing speeds ranging from 3mbs to 100mbs utilizing the current 3650-3700mhz band for the majority of these locations. As an operator in the 3650-3700mhz band since 2009 we have invested well over $3,000,000 in our network and have seen the quality and quantity of our services grow to meet the ever-increasing needs of our customer base. In anticipation of these growing needs we have already invested over $250,000 in new technologies based on the original CBRS band rules.

We had plans to spend at least another $1,000,000 on equipment for both upgrading and expanding the network with the new CBRS band in mind over a two – three year span. The $250,000 original investment was over two years ago. We have since nearly stopped all additional investments in this band due to the uncertainty of the future of this band and the proposed changes for PAL licensing.

We believe the proposed changes to PEA boundaries vs census tracks will force the cost of this licensing to an unobtainable level for operators of our size. We need PAL licensing to continue to meet our customers needs for reliability from our network. Our area though rural is affected by outside interference from an assortment of sources. Without PAL licenses we believe the impact on quality and reliability will impact all of our customers, from the Local Police and Fire departments depending on our services to the working from home families that our network supports. Our existing network currently is covered by two PEA boundaries. One of which also covers the largest Metro area in MN. We have no delusions about our ability to compete against the large cellular operators for this PEA and as such nearly 1/3 of our existing network will not be able to have the protections afforded to a PAL license. This is a best-case scenario if the changes in front of the FCC are approved.

We are concerned about the future of our industry, without additional spectrum to alleviate congestion and open up opportunities for faster services and additional customer growth, the viability of the industry is in question.

Thank you for your time in considering our position on this matter.

Anthony Will

VP Broadband Corp