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December 28, 2017

RE: Comments Regarding Notice of Proposed Rulemaking, GN Docket No. 17-258

To whom it may concern:

Wonderlink Communications is a small ISP located in Jupiter, FL. We provide services to both residential and commercial clients via a mixture of fiber optic cabling and fixed wireless service in northern Palm Beach County. Our value proposition to our clients has always been to provide high quality Internet and customer service at affordable prices. Our smallest competitor shows annual revenues in the hundred-million-dollar range, with our largest competitors well into the billions while ours are sub-millions.

### **Competition**

We feel the best way to keep all players in the industry honest, is to have many of them competing on a level playing field. A level playing field includes access to regulated resources at prices that even small businesses can afford. With the FCC's proposed rule of offering priority access licenses (PAL) for the Citizens Broadband Radio Service (CBRS) spectrum span over partial economic areas (PEA), the cost of these PALs will be cost prohibitive thereby preventing small businesses from providing an alternative option to the big business ISPs that already dominate much of the country.

With the repeal of the FCC's net neutrality rules, it's more important than ever to prove to the general public that the free market can self-regulate. Providing an environment where alternatives to the often-found duopoly can exist is imperative. With the oversaturation of 2.4 Ghz and 5 Ghz spectrum, 3.5 Ghz - 3.7 Ghz is the only clear interference-free spectrum available for us to use in order to offer high quality, broadband Internet service where fiber optics is not a viable solution.

### **Affordability**

We operate in PEA #9 which covers 10 counties and 9,688 square miles. To raise enough capital to try to cover that much area, we would be required to bring in multiple investors for several rounds of funding which would make the company's top priority shareholder profits rather than quality of service to the customers. Putting the customer first is what allows us to win customers from our much larger, much more capitalized competitors. Remaining small is what allows us to have better control over our service personnel and more granular control over our network.

### **Investment**

In regards to spawning further investment, it is worth considering what the providers currently utilizing ISM band spectrum have done for the ISP industry. The free unlicensed nature of the ISM band has allowed market disruptors to develop cheaper, but still very effective equipment to allow a whole subcategory of the ISP industry - wireless Internet service providers (WISP) to flourish. By making the CBRS band unattainable to smaller WISPs, the FCC will essentially be limiting investors to the likes of T-Mobile, AT&T, Verizon and Sprint. By making the CBRS band attainable to smaller WISPs, the FCC will be providing an environment where equipment manufacturers will have a larger customer base and therefore it will become more attractive for those manufacturers to innovate and produce market disrupting equipment that will not only make more



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competition possible, but also reduce the cost of last mile service. This will allow WISP's to provide a wider range of services better tailored for their customers' needs and financial means.

## **Conclusion**

It is our stance that either the current rule of keeping the geographic area for each PAL as one census tract remain or in the interest of finding common ground, reduce the area span to cover census county subdivisions.

**Appendix A** shows what our coverage requirements would be with the current CBRS rules in place. We would acquire PAL's for 41 census tracts with a coverage of ~128 square miles.

**Appendix B** shows what our coverage requirements would be with the proposed rule changes. We would be required to acquire one PEA that covers 9,688 square miles which is 9,560 square miles more than our intended coverage.

**Appendix C** shows what our coverage requirements would be if PALs were delimited by census county subdivisions. We would acquire PALs for 4 census county subdivisions which would cover 393 square miles. This cuts the coverage size down to one that is manageable by small businesses when comparing to the proposed rules, and in our case, reduces the amount of PAL's by just over 90% (41 PALs down to 4) when comparing with the current rules.

**Appendix D** shows the overlap of all 3 appendices

We would also like to see the term of the PALs extend no further than 3 years. This would prevent other companies from hoarding PALs for extended periods of time, thereby holding competition at bay, similar to how grandfathered earth stations that have gone out of business prevent new 3.65 locations from being acquired due to lack of an expiration date with renewal option.

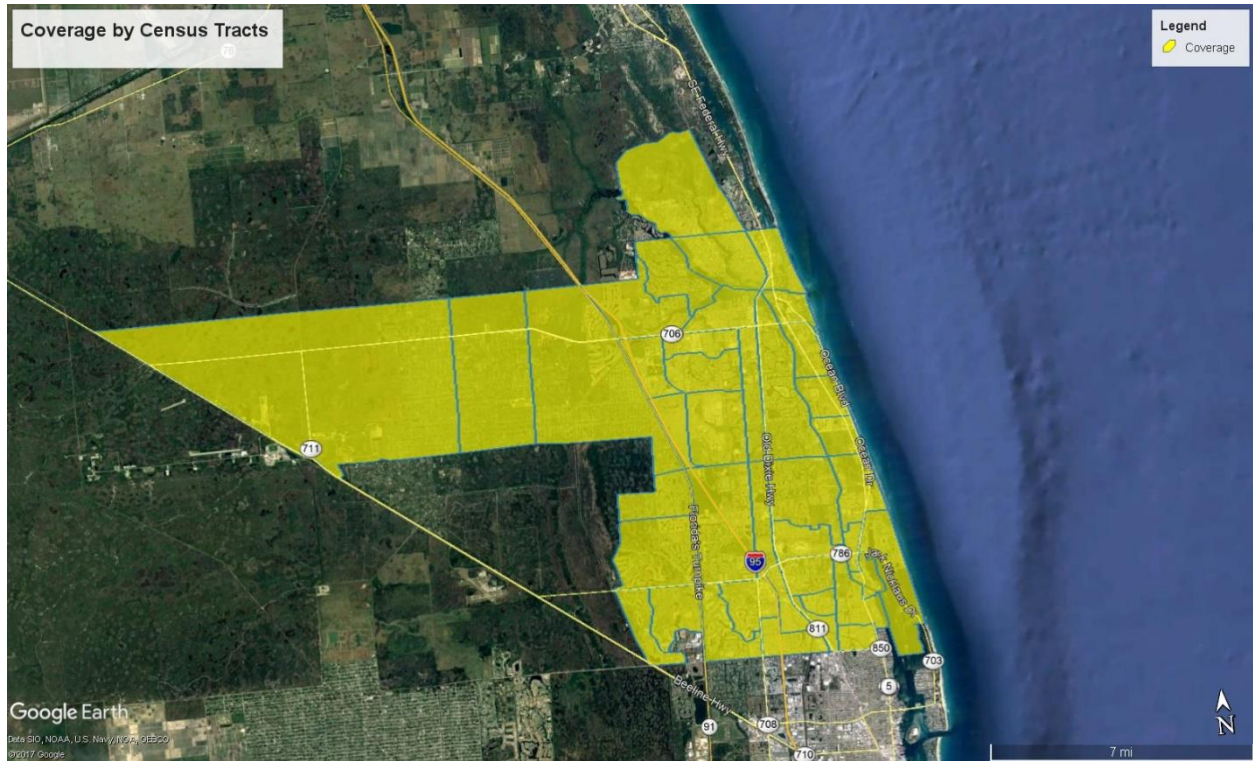
Respectfully,

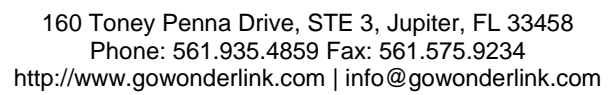
Brian Artigas  
President



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## Appendix A





Coverage by PEA

Legend  
PEA 8

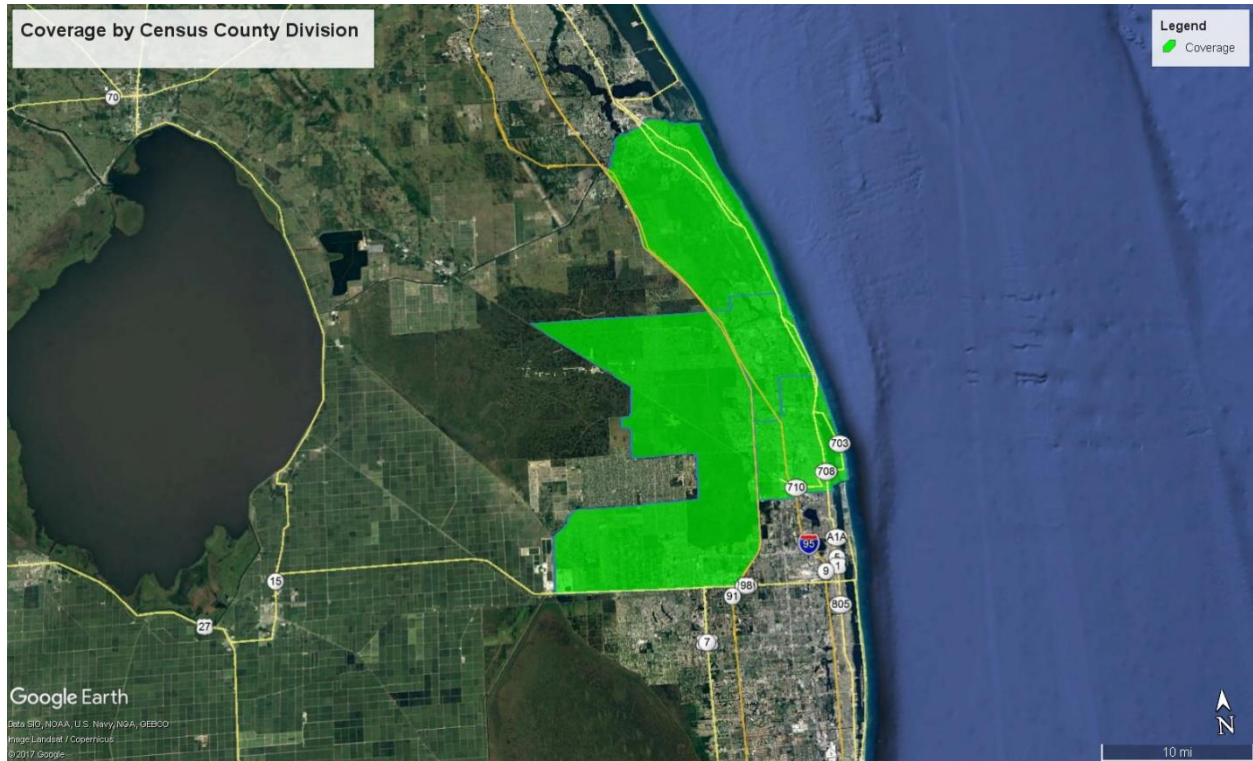
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## Appendix C



## Appendix D

