

Filed Comments on SBRS with the FCC from Conifer Communications

12/28/17

Conifer Communications is a rural wireless internet service provider in Tuolumne, Calaveras, Mariposa, Merced, and Stanislaus Counties with over 2000 customers. Our residential speeds range from a lite package at 1.5x1 Mbps to a platinum package at 25x3 Mbps. Our enterprise customers receive dedicated connections and support on plans up to 200x200Mbps. All of our internet services include unlimited data. We also offer VoIP services for residential and business customers.

We are opposed to the proposals to increase the size of PALs or lengthen the term of licenses as they will hurt our customer, our expansion to serve new customers who are currently unserved.

Conifer communications is licensed to operate in the 3650 MHz spectrum and we have invested a great deal of resource to offer services to our customers in this spectrum. The 3650 MHz spectrum license was necessary to be able to reach new customers asking for service. With a few ISPs, other services and companies broadcasting signals, and limited towers, all available spectrum available in our area is necessary to meet the needs of our community. We will continue to apply for and use any bands made available, including the CBRS band. Access to the 100 MHz of the mid-band spectrum will allow us to further our mission meet the needs of our ever-growing rural community. Any additional spectrum would greatly improve all our ability to serve our customers and would improve internet service in our community by decreasing congestion and interference, and allow for greater throughput of bandwidth. It would also lead to further investment in our network.

Being a rural provider, especially one who reaches into multiple counties, we would be negatively affected by the expansion of the geographic area of PALs to an area larger than census tracts. If the geographic area is increased to an entire county, we would only be able to serve 1 of the 5 counties which we operate in with this new spectrum. Communities like Greely Hill, which is in Mariposa County, but who's citizens are more of a township of Groveland, a Tuolumne County town, could not be served. Half of our customers are in counties such as this.

For all of the reasons listed above, we are opposed to the proposals to increase the size of PALs or lengthen the term of licenses as they will hurt our customer. Please do not continue with the proposed legislation.

Thank you,



Sonja Harris

Conifer Communications, Inc.