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Via ECFS

Marlene H. Dortch, Secretary

Federal Communications Commission

RE: GN Docket No. 17-258

445 12th Street, S.W. Washington, D.C. 20554

Dear Ms. Dortch:

BDA Wireless, LLC is a startup, small wireless internet service provider (WISP) and a proud member of WISPA. We strongly oppose changes proposed to the CBRS band petitioned but TM/CTIA. The change of the units for PAL license area is too large for any small company to invest and capitalize. The increase of license term to 10 years will also make the said PALs investment for a small company too large even when on a smaller land mass.

We started in January of 2017 to meet the demands of the community to have a broadband internet option. We have strategically placed our towers to fill in the areas that are not covered by anyone other than cellular and satellite metered connections. We spent the first 9 months of the year focused on building infrastructure and stability of our service. As of October first, we started adding customers. We now currently provide broadband service to 18 homes and businesses with capability to offer as high as 65Mbps.

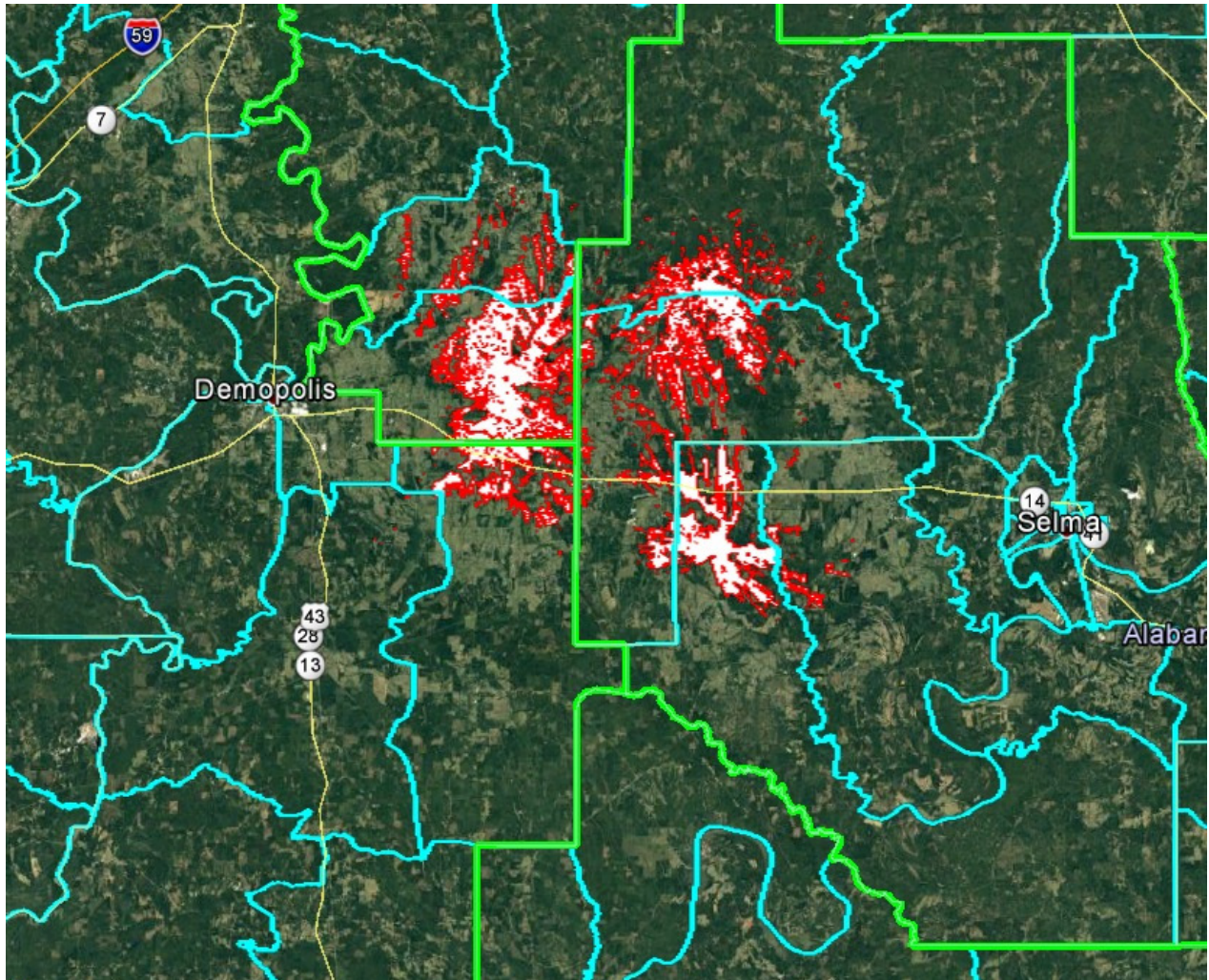
We chose to invest into the upcoming CBRS band based off of the ability to provide the best service to the underserved population. Many of our customers have either not had access to broadband or elected not to purchase from cellular or satellite companies due to the high cost. We invested in the 3650 NN band with good faith that the FCC would continue with original R&O of 2015 to add additional spectrum and make partially licensed by the Census Tract. This would allow us to add density to our deployment to insure adequate speeds to the end user without fear of inference. We have been preparing for the auction on the Census tract sized PAL proposed in the 2015 Report and Order since the day we deployed our first piece of CBRS compliant equipment. We have invested well over \$50,000 in the band already, but since the release of the NPRM and CTIA/T-Mobile petition, we have stopped investing in the CBRS band. All further construction is now pending until The Commission's ruling.

We currently offer service in 3 counties (Perry, Hale, Dallas) in the Alabama Blackbelt (near Selma) which is the poorest area in Alabama. We offer service in roughly 195 square miles with an estimated population of 2000. The adoption of PEA sized PAL license areas would be far too expensive since our existing network is located in 3 PEAs (#300, #344, #377), and it would also doom any future expansion. These 3 PEAs would consist of 10,596 square miles, and our network only covers 1.8% of that area. As for the Census Tracts, we would have a chance at bidding and winning a total of 5 tracts (6870, 404, 405, 9871, 9731). These tracts make up 906.8 square miles and our current network covers 21.4% of the area. Below are a few pictures to put that into perspective.

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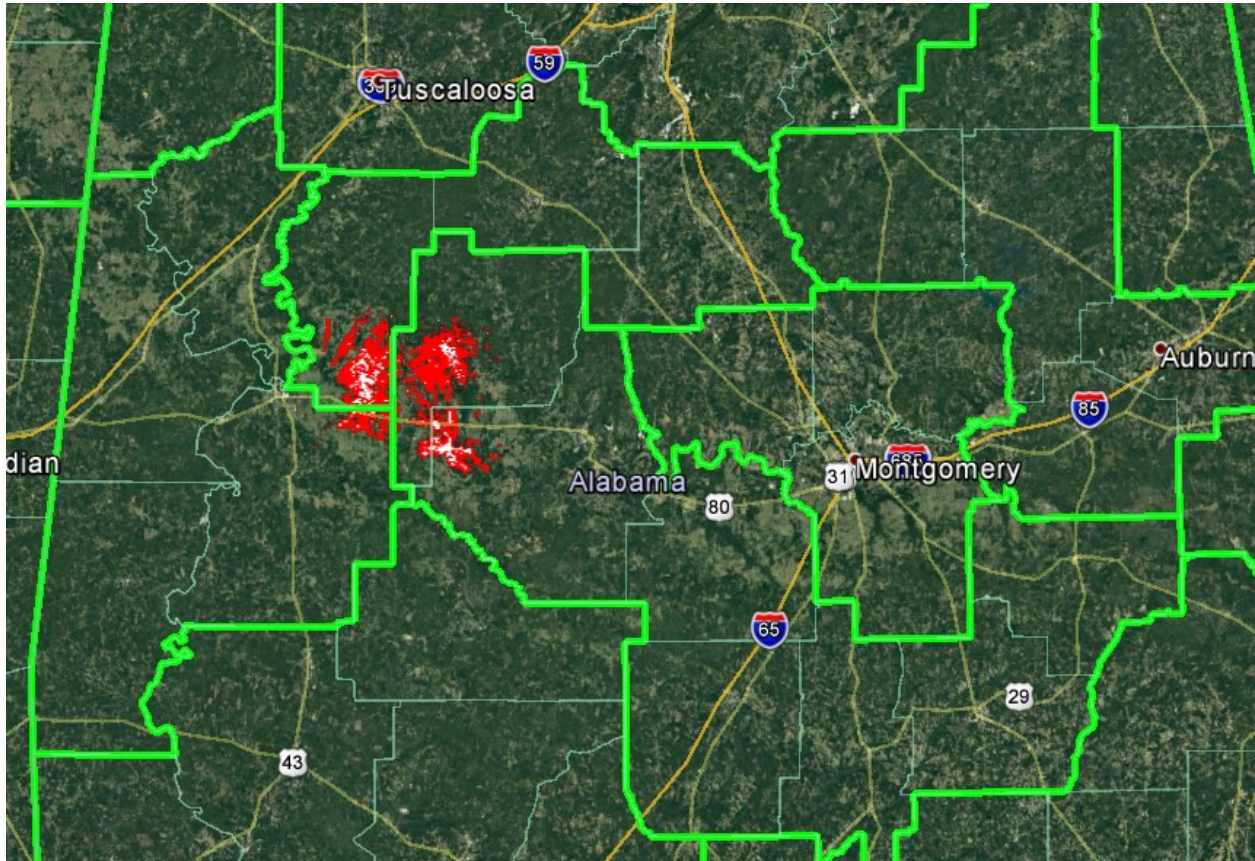
This photo below depicts our coverage area.

The BLUE lines are Census Tract boundaries. The GREEN lines are Partial Economic Area boundaries. The RED and WHITE is a coverage map for our existing service.





This photo depicts the large size of the PEA for our current coverage area. We will not be able to economically bid on an area with this much land mass.



Thoughts:

If we were able to acquire 3 licenses in the PEA 300 (south of Montgomery), that would leave 4 available in the PEA. This would mean that Alabama Power, Black Warrior Power, Pinebelt Wireless, Spire Natural Gas, and any other company that may be interested in a secure, private network now only have 4 possible licenses. Keep in mind, this is the most rural and poorest area in Alabama. We should not have to obtain a license for an area that is 95% larger than the area we intending on ever using.

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In closing, I hope you will consider my comments as well as the other WISP relying on the ability to use the CBRS band to A) over service in under-served areas B) improve the speeds of service to existing areas to meet the classification of broadband. It is very crucial that no changes are made to the 2015 R&O as this would create uncertainty in something that several thousands of companies have been making preparations for the rules as they were published. Any changes made may decrease the investment by companies like BDA Wireless, and this would then cause a decrease in R&D for the technology. Companies that have been actively designing their system around the rules for CBRS may begin to trail other bands to make up for the loss in potential revenue. As for 5G wireless for the large mobile companies, there are much more efficient spectrums to use for 5G. CBRS is the chance to bridge the digital divide, don't waste it on getting higher speeds to someone who already has a phenomenal connection. CBRS should not be the transportation for Virtual Reality handsets in an urban environment. CBRS should remain as designed to be the opportunity for small businesses and individuals to deploy secure and reliable private networks.

Thank you for your time,

William C. Bardwell

Operations Manager

December 28, 2017