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December 27, 2017

Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

Wave Wireless Comments Proceedings: 17-258

Dear FCC Commissioners:

Wave Wireless started out of pure necessity and you might say by accident. I needed internet service at my house to allow me to work from home. Broadband was not available. As an engineer and Kansas farm boy, I decided to fix the problem. I built a wireless network to get service to my house. It was not long after that, I had neighbors inquiring and wanting me to connect their homes to broadband internet. Wave Wireless was born.

We now focus on delivering reliable broadband internet to a small part of rural Kansas. Wave Wireless serves approximately 2,500 customers, including schools, municipalities, libraries and emergency services. Many of our customers have no other choice for true, low latency, no data cap, broadband internet service.

Wave Wireless has leveraged the existing 3650 band but the existing band has limited capabilities due to the limited amount of spectrum available. We are very excited about the future capabilities of CBRS and what we will be able to do with the additional spectrum combined with advances in technology and equipment. We have orders placed and expansion plans that revolve around the CBRS band.

We ask the commission to not change the rules. Do not use PEAs as a basis for license areas and instead, as originally proposed, use census tracts. If PEAs are used, it will crush the ability of small, rural ISP's to obtain PAL's and deploy the next generation of wireless networks. We (the small guys) are not asking for favoritism; we are just asking to keep the blocks at a size that we can work with. Keeping the block size at the smaller level should not hinder any provider, large or small from obtaining licenses. We all know spectrum is a limited resource. Not changing the rules and keeping the blocks at a smaller level, will result in more coverage being built in those rural areas. It will add greatly to the utilization of the CBRS band and help providers large and small, utilize the band to its fullest and deliver broadband to rural America. We believe this issue is one of the most important decisions and factors in helping to provide broadband to rural America.

We oppose the proposal to increase the size of the PAL.

Thank you for your consideration,

Galen Manners  
President / Wave Wireless