



RE: Proceedings: 17-258

New Era Broadband LLC

Dear FCC,

New Era Broadband is a Wireless Internet Service Provider (WISP) located in rural Southeast Ohio (Appalachia). We are headquartered in Pomeroy, OH (Meigs County Ohio) just across the river from Mason, WV (Mason County WV). We operate in a county of 23,000 residents, which fewer than 10,000 have access to High Speed Broadband Internet from the large terrestrial based carriers. Less than 50% of these even have cell signal with a quality level good enough to support LTE services. This whole region is considered economically depressed, with very little of the rural area now served with broadband Internet. The bigger populated areas have broadband Internet service available from some of the large carriers, but once you are outside of a town or village, you are outside of Internet service area. Once the population base drops to a few houses per square mile folks here have no Internet service. With the hills and trees even, satellite has issues. This part of Ohio is very hilly and has lots of trees with most houses being built in the valleys between the hills covered in native trees. In Southeast Ohio most native trees easily reach upwards of 70 plus feet tall. Because of these factors line of sight radio signals just totally come up short for the delivery of Internet service. We as an industry need the improved power and performance of the CBRS spectrum to provide service to this population base. The large carriers have proven time and again that these rural areas are not on their priority list for providing service. As a local WISP we only ask for the tools to be able to provide the service and we will make it happen.

The proposed changes to the CBRS, which place our network into the Charleston, WV PEA (PEA Number 52) will greatly hamper our ability to provide service to the unserved and underserved. Our population base doesn't hold well for us to even begin to bid on the PEA type auction system being proposed by the mobile carriers. We offer our residential customers service plans with speeds up to 25Mbps to the home and are working on upgrading our networks to provide even better service, but we have hundreds of homes that we can't even reach with the current technology, and are counting on the tools that the CBRS promises to bring to allow us to reach nearly every home. The fact is, local WISP's like us are who are conquering the digital divide in Rural America. Please don't give the tools we desperately need to the large companies that already have many tools in their arsenal yet still refuse to put them to use in Rural America!

The proposed licensing changes to the PEA in the CBRS would make the general use of the CBRS cost prohibitive for us. To provide initial service in the area we operate in is very hands on and labor intensive, versus the higher population areas. Because of the terrain and woodlands, bringing internet to each local house becomes an engineering feat within itself. We live in these areas and our customers are our neighbors and friends. We want to provide them with true high speed, broadband Internet service. That is why we have

taken out loans against our homes and run our credit cards limits up, known that we are helping to make a better community. Yes, we expect to make our investment back, but we in no way expect to die as a millionaire or even close.

In summary we feel that Census Tract based competitive bidding is the only way we will have a fair chance to get spectrum in rural areas that are unserved and underserved by the companies that already have spectrum that they are not using in these areas. By expanding the license to the PEA model you are including major population bases into the operating area in the bidding process which will do nothing for us in the rural market, in fact, we believe it will further the digital divide by making the likelihood that a vast number of these homes will never have the opportunity for true Broadband Internet service. It will make the license needed to serve these homes cost prohibitive to the very service providers who are willing to work and get service to them. While the Census Tract based model doesn't preclude the mobile industry from bidding on any census tract, it will allow the WISP serving the small market a chance to offer better service.

We submit to you that the current rules will meet the goals of the FCC quicker and more economically than the alternative proposals that are being looked at. Our company currently serves 506 customers in the areas where the other carriers refuse to operate. We have been armed and ready to invest heavily in the 3650-3700 MHz technology, but have been waiting to see how the CBRS plays out. We maintain that with the current rules, we will bring service to the roughly 1,000 additional underserved and unserved that we will never be able to afford to reach with the proposed rule changes. If the proposed rule changes take place, we believe it will ultimately leave many, if not all of these homes unserved, just as they are now.

Respectively submitted
New Era Broadband
Dave Hannum Owner
Larry Schriver - WCH Consulting
119 E. Memorial Dr.
Pomeroy, OH 45769