

To whom it may concern,

MitoTec, LLC is a Fixed Wireless Operator serving the Illinois and Indiana markets, receiving funding through the ARRA Program we have successfully built a network with the ability to serve over 100,000 homes with 25 Mb/s service.

The network that was constructed to server Rural Illinois and Indiana was built upon the ability to utilize the 3.65 band, and the additional use of 100MHz of spectrum will permit us to invest more to increase the speed offerings and re-engage the investment in the band. For the last 12 months, we have been forced to stall the investment in the band to understand what will or will not be made available for us to deliver broadband to more of the Customers in our areas. Additionally, we have not expanded the network to reach out further in order to deliver more service to more underserved areas.

We strongly oppose the proposal to increase the size of the PALs, as it will force us to take capital to acquire the larger areas that can be utilized on hardware and infrastructure to better serve the small businesses and homes in the areas we would be able to obtain PAL licenses for. Expanding the network in a financially healthy fashion is responsible use of the capital we have and have full intentions on doing so, but the business model has to make sense to us and the consumers of our services we serve.

Finally, extending the term of the PAL length we foresee as a negative issue for Small Businesses like ours and ultimately the Small Businesses we serve. If the larger Tier 1 operators are for the extension of the terms they have nothing to lose by supporting a shorter term, assuming they are actually serving the areas and not squatting on the spectrum. Shorter terms will enable operators, like us, willing to invest in the areas and actually deliver the service to foster growth in the communities.

MitoTec, fully supports WISPA’s position with respect to the CBRS rules and oppose both the increase of the PAL sizes and extending the term length.

Brian Young

MitoTec, LLC