



LINK
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Federal Communications Commission

445 12th Street, SW

Washington, DC 20554

Re: Link Technologies, Inc. & TowerCoverage.Com
GN Docket No: 17-258
Notice of Proposed Rulemaking

Link Technologies, Inc. works with over 1,000 (one-thousand) wireless internet service providers, mobile operators, state, county and city fixed operations, as well as countless wireless vendors within the United States. We are a WISPA (Wireless Internet Service Provider Association) Vendor member and sell hardware for fixed wireless operations. We are a small business located in Dittmer, Missouri, employing a number of local personnel. Some of these are qualified and skilled engineers performing programming work for our clients.

Furthermore, we operate a website under the name of TowerCoverage.com. This website allows operators from around the world, as well as within the US, access to a method to understand where their wireless radios will cover. We perform over 12,100 (twelve thousand one hundred) coverage map jobs per month; with over 108,900,000,000 (108 Billion, 900 Million) calculations being performed each month. TowerCoverage.com allows fixed operators to have a method to get their form 477 fixed broadband deployment data quickly and accurately.

Continued on next page



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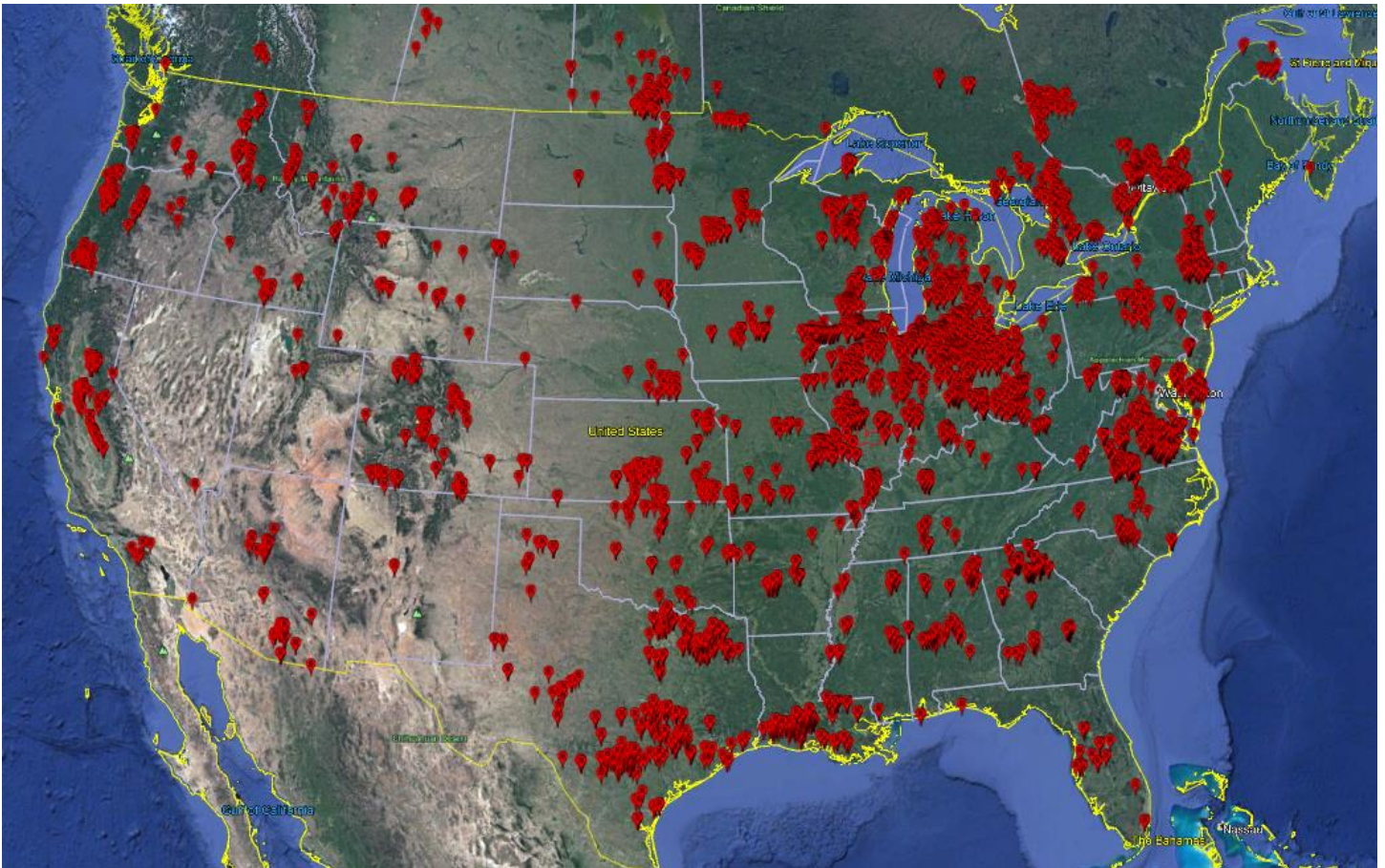
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TowerCoverage.com represents a large proportion of fixed wireless operations within the United States, and wishes to comment on the upcoming CBRS ruleset that is currently being entertained. Currently we have over 6,500 (six thousand five hundred) active coverages in our data set that include 3650 MHz as the rendered frequency. This shows there is significant 3650 MHz usage and innovation within this band. Below is a map of the US with rendered 3650 MHz coverages.



- Note that this map does not indicate that 3650 is in use, just that a subscriber to TowreCoverage.com has rendered a map using the 3650 MHz option at this location.

As you can see there is quite a bit of interest/usage in the 3650 MHz frequency band and with additional CBRS frequency spectrum, this will become even heavier.



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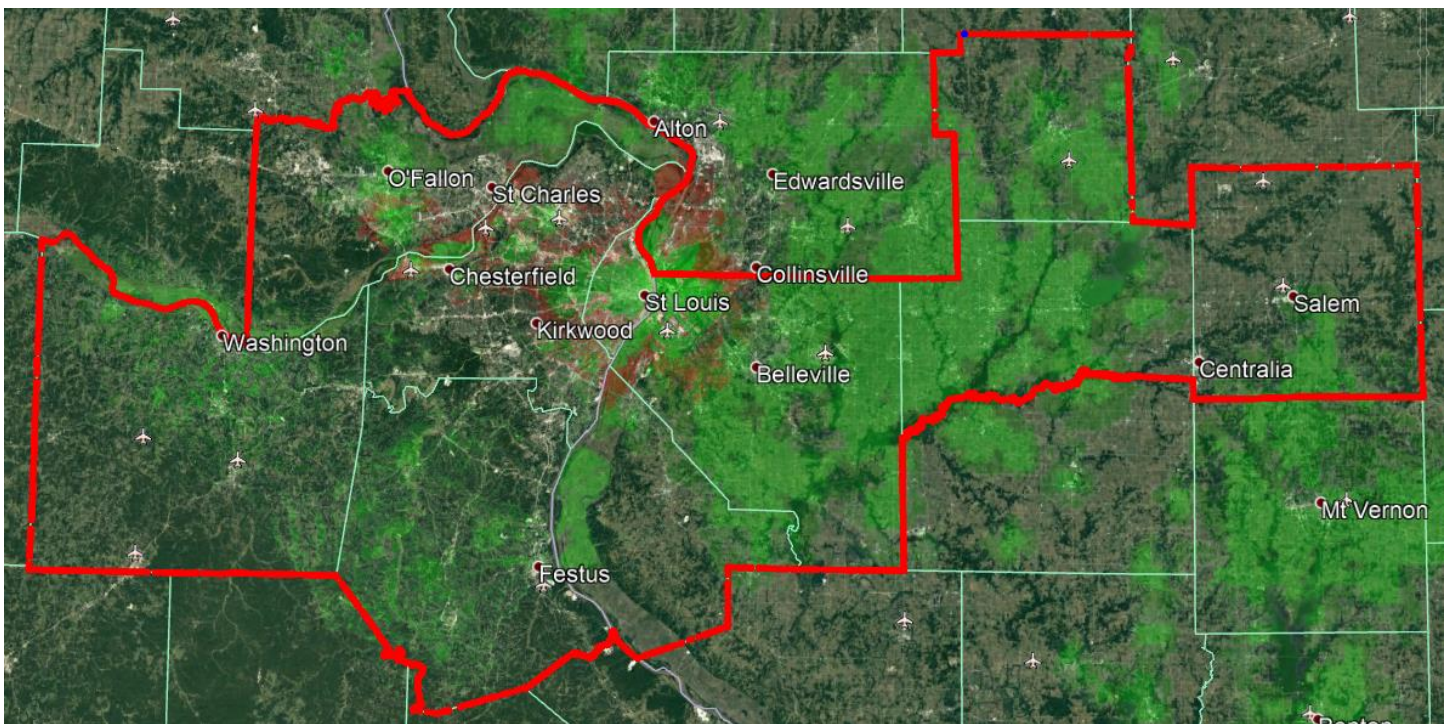
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In regards to the NPRM, the two specific items we wished to cover is the adjustment from census tracts to PEAs as well as extending the PAL license terms from 3 year to 10 years. First, the 3 to 10 year term limits with the renewal expectancy. If we moved to a 10-year term, it would be 10 years before the first operators who purchased PALs and did not deploy on the band would be up for removal. Smaller operators are not going to invest into a band that all of a sudden an operator that purchased a PAL 5-9 years prior moved in and setup shop, therefore forcing them onto other GAA frequencies that may already be occupied. This will slow down deployments with small businesses.

The second is the PEA, many of our clients, small businesses, will not have the funding to attempt to get PALs with such a large area. The PEA the St. Louis area, covers over 5,308 square miles. It includes St. Louis County, Jefferson County, Franklin County, St. Charles County in Missouri, and contains parts of Illinois including, Monroe County, Clinton County, Bond County, and Marion County. (as shown on the next page)



As you can see from the image above, we have a number of operators operating within our single PEA. Census tracks would allow operators from different states as well as operators within the same region to have the ability to bid on a PAL that would be of a size that we can actually use. By increasing the PALs to PEA size, it effectively eliminates the small businesses from the marketplace. The big mobile and other carriers that have the funds to bid on large PEA PALs would focus their efforts where their money is; in this case would be St. Louis city, vs the many rural areas that are included in the PEA.



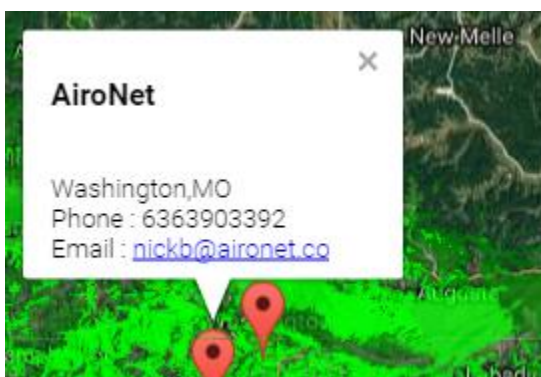
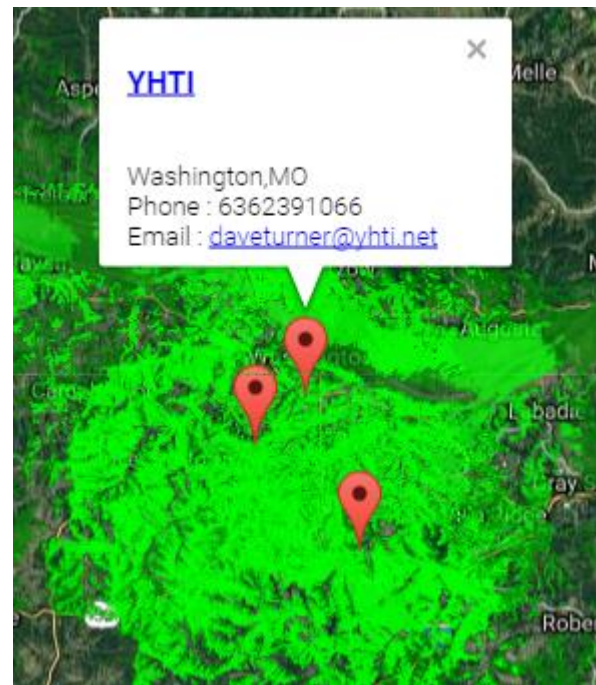
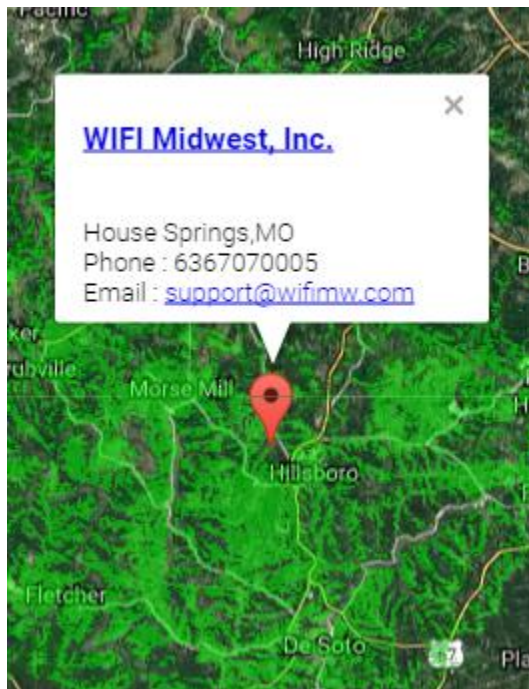
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Inside this area, we have a number of operators:



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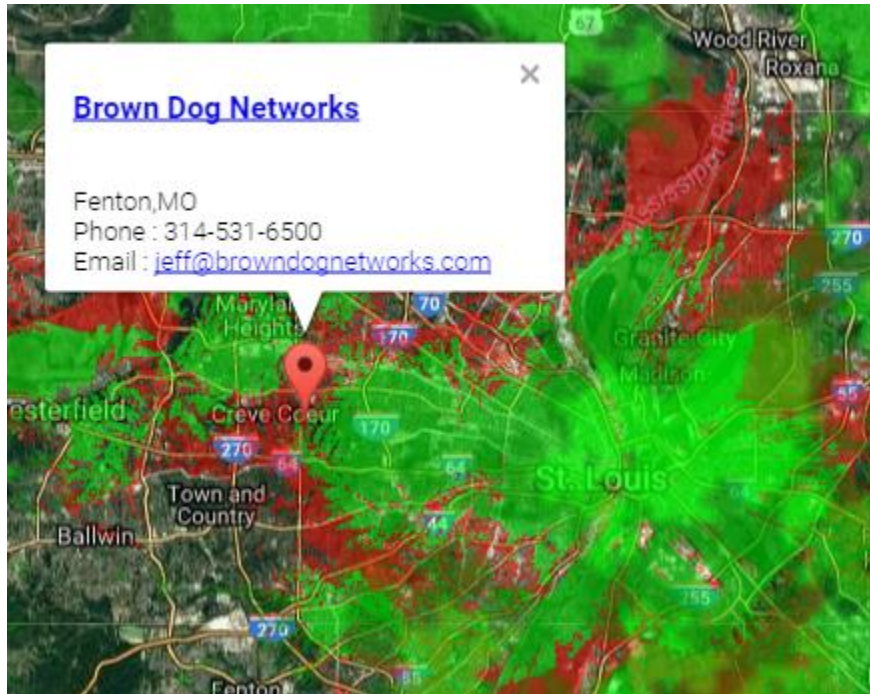
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The FCC must know that the PEAs suggested are excessively large but to only a few operators within the US, the census tracts are much simpler and allows small business to move forward with plans to operate in the CBRS band.

Sincerely,

Dennis Burgess

Dennis Burgess
Secretary
Link Technologies, Inc.