



**Before the
Federal Communications Commission
Washington, DC**

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| In the Matter of |) | |
| Promoting Investment in the 3550-3700 MHz |) | GN Docket No. 17-258 |
| Band; |) | |
| Petitions for Rulemaking Regarding the |) | RM-11788 (Terminated) |
| citizens Broadband Radio Service |) | RM-11789 (Terminated) |

To: The Commission

**COMMENTS OF
SONICNET, INC.**

Lori C. Collins, President

December 27, 2017

I founded SonicNet 10 years ago in the fall of 2007 because my area in northern Wisconsin and the Upper Peninsula of Michigan simply didn't have options for internet service other than satellite and dial-up. Even in 2007, the speeds and/or latency offered by those services were inadequate for the basic online activity for my family and neighbors.

Since 2007, we have been providing service to nearly 1000 households and businesses in the North Woods, where we not only have full-time residents but many (about 40%) homes that are second homes around our beautiful lakes, 1200 in my county alone. Our customers are savvy users who have cable and fiber connections at their primary homes in Chicagoland, Milwaukee and Madison.

Over the years, we have upgraded equipment as it became available to meet the bandwidth demands of our customers (and ourselves!). In 2015, we deployed a fairly new fixed-wireless platform in the **3.65GHz spectrum**. The results were impressive. We desperately **needed a replacement for the 900MHz** equipment that penetrates the dense foliage of our region. Existing 900MHz equipment, at the time, was capable of a maximum 3Mbps download speed, not nearly enough for our customers' needs. The 3.65GHz was a close match for signal penetration, while it **offered speeds of at least 10Mbps** download. An amazing difference! The cost was significant, but it was deemed worth it on a business model. **We currently offer packages with speeds up to 15Mbps for residential customers and up to 50Mbps for commercial customers.**

Approximately 20% of our customers are using this CBRS spectrum, for which we have made an **investment of \$100,000**, an amount that is significant in our budget, which is annually about \$450,000 in revenues. Further investment of tens of thousands of dollars is quite honestly impossible in this scenario were we required to purchase licensing based on land areas larger than census tracts.

Now, let me share where we are and what our census tracts look like: Vilas County, where we predominately provide service, has **21,000 households, most of which surround the 1200 lakes, and 40% of which are owned by seasonal residents (summer only)**. With a population density this low, and a land area of about 860 square miles, even a census tract has low household numbers. We are not a large company serving multiple counties: we have service in three counties. And while the land area of these counties is fairly large, the housing density is not.

A Partial Economic Area in our neck of the woods might reasonably be as large as the entire Upper Peninsula or a five- or six-county area in northern Wisconsin. For us to bid on Priority Access Licenses based on PEAs would mean saying that we would use the CBRS spectrum for an area that we simply don't and most likely never will cover. It would be useless and most likely too costly.

With the possibility of licensing requirements changing to the point of our not being able to afford access to this spectrum, we are forced to either provide services to fewer households, those which cannot be reached with more line-of-sight frequencies, or to build more towers to cover smaller land areas where we can get more line-of-sight connections. Either scenario is a major hit to our fiscal bottom line.

On the other hand, if we are able to bid for specific census tracts at reasonable rates, we can continue to invest in network upgrades using the CBRS spectrum and provide our customers with continually better service, both in speeds and quality of service.

We trust that the Commissioners will reflect on the millions of households and businesses who are served by fixed-wireless providers in rural America. Even in 2017, we have many areas right here in Northern Wisconsin that have very poor options for broadband services. And those residents are

essentially living in a second-class society without the ability to conduct business, learn online, access telemedicine and remain in their homes longer as they age.

I urge the Commissioners to keep the current PAL rules in place and allow small providers such as SonicNet the ability to grow and prosper, providing much-needed broadband service in rural Wisconsin and Upper Michigan.

Lori C. Collins

President