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December 27, 2017

Marlene H Dortch, Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

RE: GN Docket No. 17-258

Ms. Dortch,

I am writing on behalf of my company, GigaBeam Networks, LLC, regarding the proposed changes being considered for CBRS both in PAL sizes and term length. We strongly oppose the changes being recommended and support PAL's remaining at census tract size with 3 year terms.

We are a WISP located in rural Virginia, serving approximately 1500 customers in seven counties in southwestern Virginia, southern West Virginia and eastern Kentucky. Many of our customers rely on us as their only option for Internet access and don't even have the luxury of quality cell phone service. We currently offer speeds up to 50Mbps and plan to increase that to 100Mbps in the very near future. Enclosed is a map of our current coverage and we have significant plans to extend our coverage in surrounding areas.

We utilize all unlicensed bands to provide service including 900mhz, 2.4Ghz, 3.65ghz, and 5.1-5.8ghz. However, these bands are increasingly being unusable to provide the quality, high performing service we wish to offer and our customers want. Because of this, we have recently been investing heavily in LTE based equipment in the 3.65ghz band with the hope to extend that investment into CBRS once it is available. Our current investment in this band exceeds \$200,000 and we have plans to purchase and expand our service with an additional two million dollar investment over the next 2-3 years. This investment is reliant on the availability of spectrum from the CBRS, without it we will be forced to reconsider and more than likely scrap our plans. This will directly result in thousands of rural citizens being left without any type of quality broadband services. We currently have a list of over 1,000 customers waiting for us to add this deployment.

We would like to invest in the Citizens Broadband Radio Service Spectrum and many small companies like ours want to do the same. However, increasing the license term length and PAL sizes to PEA boundaries will make this impossible. My company would have to purchase PALs in 6 different PEA areas and will probably cost millions of dollars which would make it impossible. Enclosed is a map of the PEA's we would need to purchase. They extend well beyond what our network currently covers and way beyond areas we plan to cover.

Please reconsider these changes as it would effectively make the Citizens Broadband Radio Service the Cellular Broadband Radio Service. Only a handful of companies (all cellular) will be able to afford or even want a license on such a large demographic areas. Once they acquire these licenses they will do what they have done all along, deploy in urban centers and leave rural America with limited to no service at expensive prices. This completely contradicts the entire idea behind what CBRS was for. This band is for innovation and small PAL areas with short terms lengths create that. It gives small companies a fair chance at creating networks that benefit rural communities. Rural unserved broadband deployment will increase rapidly as well as more competition in rural towns. This helps to alleviate so many problems citizens currently face including little to no service offerings, higher pricing for services, and the debate on net neutrality (competitive networks will naturally be net neutral). Census tract areas and short term licensing opens up the availability to this spectrum no matter what size the company is.

Why would you want to limit the ability to acquire spectrum to only a handful of companies that will inefficiently use it? To solve our rural broadband problem, the more businesses that serve these areas the better the service will be and the faster it will be deployed.

Thank you for your time and consideration in this matter.

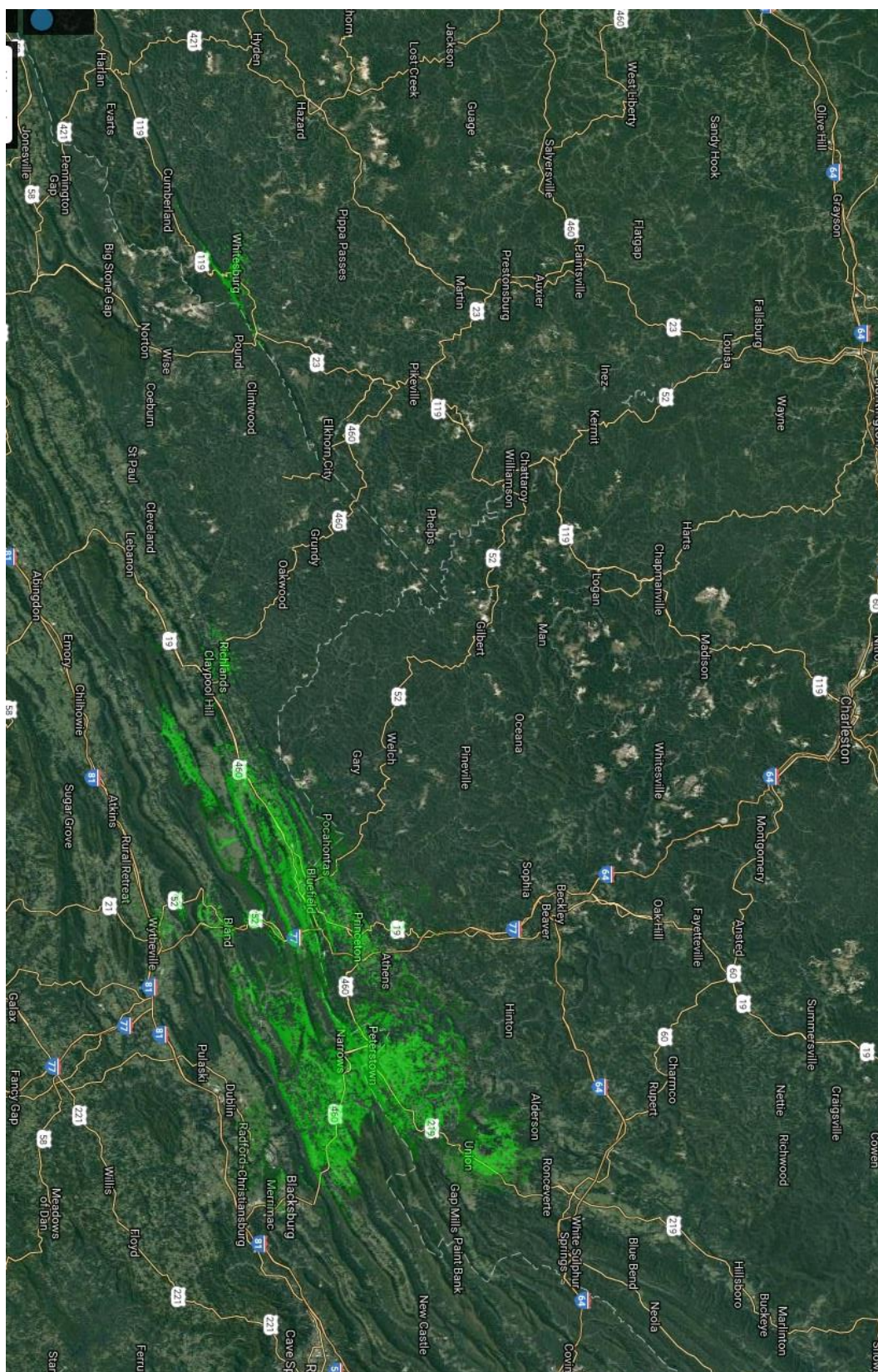
Sincerely,

A handwritten signature in blue ink, appearing to read "Michael Clemons".

Michael Clemons
President
GigaBeam Networks, LLC
a WVVA.net Inc. Company

Enclosure

Current Coverage Map



PEA's Required for Current and Planned Expansion

