



The Junction Internet LLC

120 S Wilson St, Ste C
Vinita, OK 74301

Phone: 918-256-3186
Fax: 918-256-3798
Email: support@junct.com
Website: <http://www.junct.com>

12/24/2017

To whom it may concern:

This letter is stating our objection of the proposed rule changes to the CBRS band regarding 3.5 GHz (3550-3700).

We are a rural Wireless Internet Service provider in Northeast Oklahoma. Our company is TERO certified (over 75% Native American owned) with the Cherokee Nation. We have over 2000 subscribers in a completely rural footprint. We currently offer speeds as high as 10 MB download by 4 MB upload. We have future plans to start offering 25/5 bandwidth with the help of the current CBRS spectrum. Our company has been in business since 1996. Much of our service area is very under-served. Some only have the option of Satellite Internet providers; which isn't adequate to the needs of voip and telecommuter VPNs.

Our business has a great need for this spectrum. We mostly use unlicensed frequencies. Unfortunately, with the higher demand for bandwidth and the proliferation of sites, we have begun to exhaust these frequencies. Until the introduction of the 3.65 innovation band and original proposed rules, our industry never had a chance for affordable licensed point-to-multipoint spectrum. We saw the CBRS band as something that fit our small business model. Many WISPs and vendors invested accordingly.

As a smaller company, we have made significant investment in the CBRS band and the LTE equipment that utilizes these frequencies. We made these investments on the reliance of the CBRS rules that were adopted in April 2015. In the past few years we spent a sizable investment in purchasing a smaller ISP for the sake of acquiring a 3.65 license. Since then, we have spent over \$100,000 in deploying and utilizing LTE equipment. Our company did \$892,000 revenue last year; so our current investment in 3.5G LTE equipment is substantial. Our future plans include adding another \$150,000 of investment over the next few years in this band to serve 25M/5M into several more rural markets. This has been put on hold pending the proposed rule changes that would make future investment inconceivable.

Our biggest objection to the proposed rule changes is changing the license size to Partial Economic Areas. Our small WISP straddles about 4 PEA's. If you look at our enclosed coverage map (PEA MAP), our home town of Vinita, OK (this has one of our larger LTE 3.65 deployments) is in PEA #278 which covers an enormous area from Central Kansas down to the northern counties of Oklahoma. We have also have about 6 LTE EnodeB 3.65 deployments in Verdigris and Catoosa, OK. This is a

small area on a large PEA covering Tulsa and much of Northeast Oklahoma (PEA #63). Another planned 3.5G LTE deployment is in Miami, OK. Miami is on the very edge of another very large PEA (PEA #216). And also there is another PEA (PEA #111) that straddles the east of our coverage area including Grove and Jay, OK.

Our WISP is setting on the boundaries of 4 different PEA's. All of our service area is in low population density rural. And unlike the incumbent cell carriers which want the spectrum for capacity; we are using this to bring access and capacity to these under-served areas. Using PEA's will more than likely price us out of the market. I will be forced to possibly purchase four PEA's which will be cost prohibitive. With the exception of the PEA #63 (Tulsa) where our coverage overlaps about 20pct of the total PEA; most of our coverage straddles less than 10-15pct of the other three PEA's.

We have also enclosed a map (Census Tract Map) of census tracts that interest us and fall into our current and future coverage with 3.5Ghz LTE. You can see this fits our model and footprint much better. We have highlighted those tracts that we will be interested in bidding for CBRS PAL's. This smaller geographic areas fall easily into our current coverage. If forced to bid on PEA's, there will an enormous amount of unused and wasted area for smaller providers.

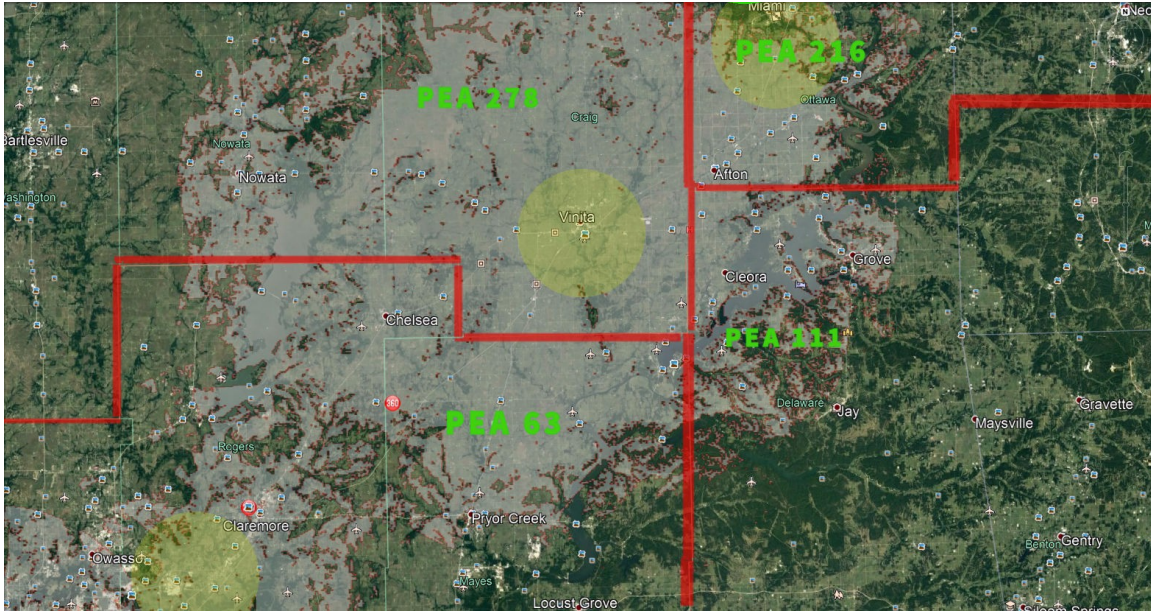
The other objection we have to to proposed rule change, is the raising of PAL terms from 3 to 10 years with "renewal expectancy". I believe this will be an unfair advantage to the large incumbent cell carriers. My concern is that this will allow large carriers to have exclusive rights to this spectrum (over potentially large economic areas) for an indefinite amount of time.

My concern is how these rule changes will impact the smaller WISP market. Most of us have made a sizable investment in the 3.65Ghz LTE equipment. Also, the smaller WISP's have a great interest in these outlying under-served rural areas. The larger carriers have shown very little interest in serving rural under-served areas (unless they have government subsidies). We are building our networks to serve these households (many without any subsidies). I believe the WISP's have been innovative small businesses that are actively working to bridge the rural broadband divide. Another concern is economic diversity. Chairman Pai has been quoted that the FCC isn't there to choose "winners and losers". Larger PEA's and 10 year renewals will insure that very few small companies (if any) get 3.5G spectrum. And it will insure that the very few and very large incumbent cell carriers will be able to lock up the spectrum.

Sincerely,

Eric Sooter, CEO
The Junction Internet LLC

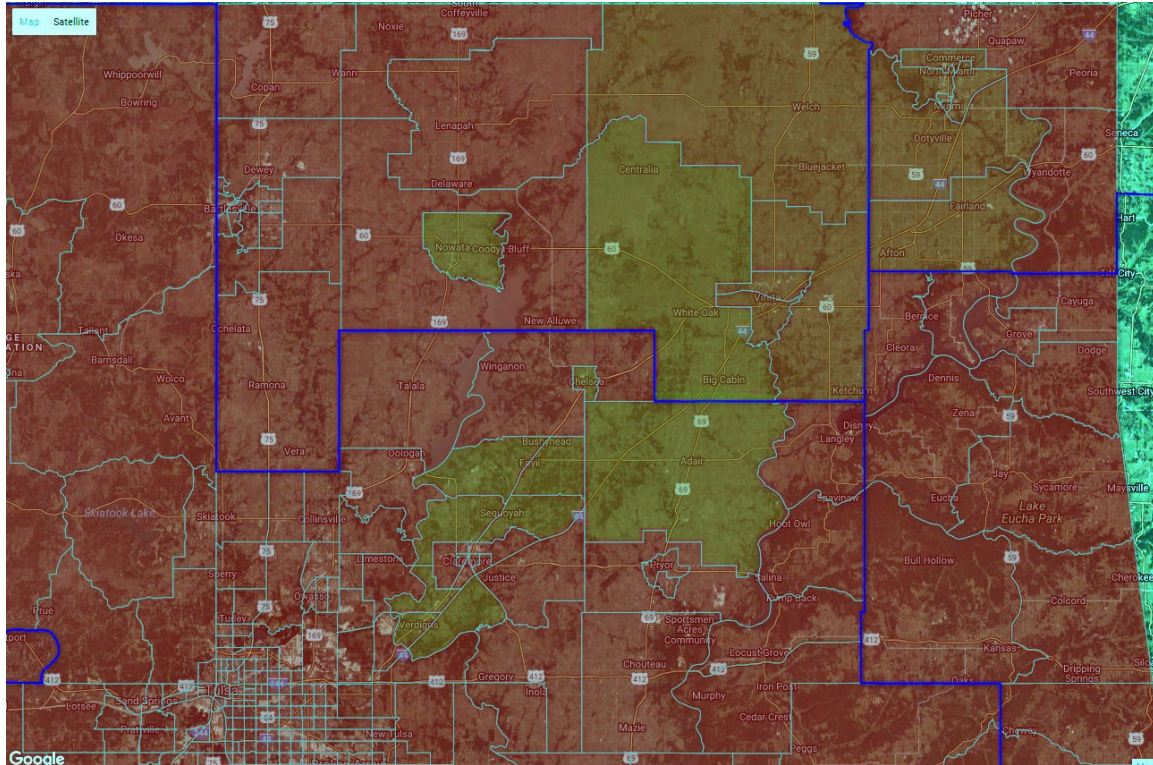
Junction PEA Map



This is our current coverage map. The bottom left corner is Tulsa, OK. Red lines show Partial Economic areas. Yellow circles show current deployment of 3.65ghz LTE gear.

This shows our small coverage map overlapping four PEAs.

Junction Census Block Map



This map shows the census blocks with the PAL's we are interested in bidding.