

December 28, 2017

Via ECFS

Marlene H. Dortch, Secretary

Federal Communications Commission

RE: GN Docket No. 17-258

445 12th Street, S.W.

Washington, D.C. 20554

Regarding Docket No. 17-258 – Promoting Investment in the 3550-3700 MHz Band

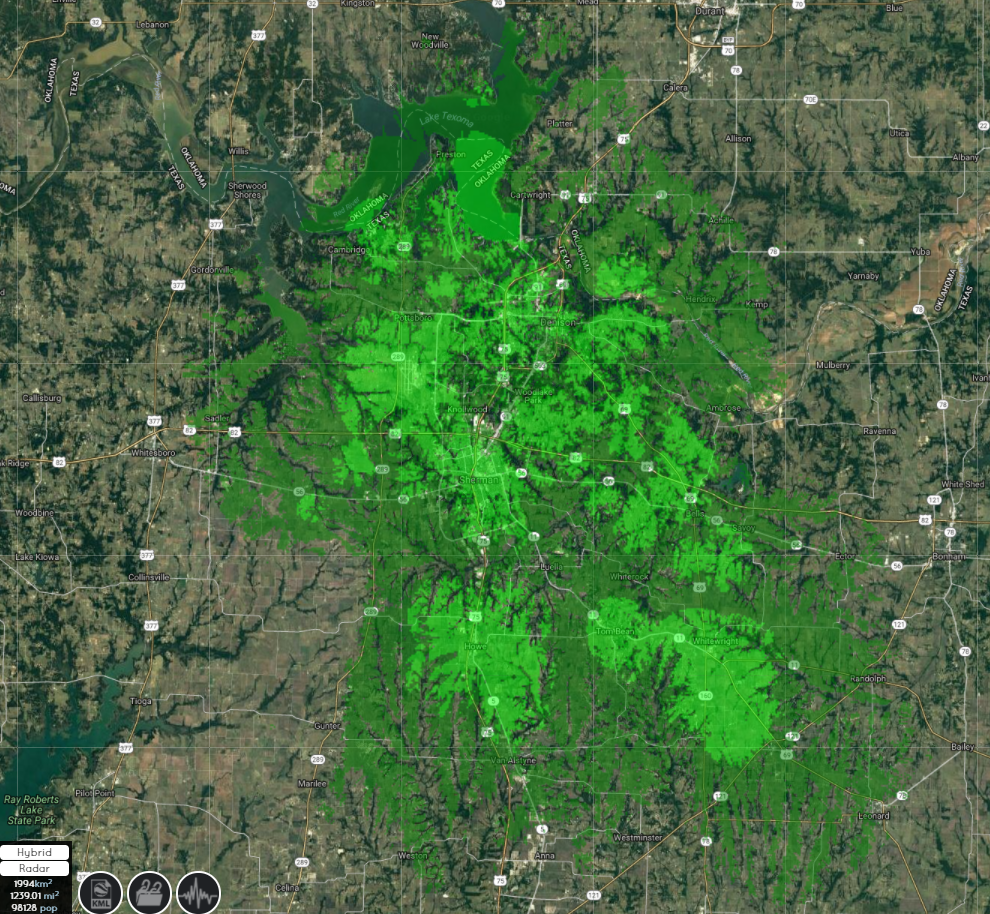
Dear Ms. Dortch:

Texoma Communications, LLC dba TekWav submits these Comments regarding the Notice of Proposed Rulemaking and Order Terminating Petitions Released October 24, 2017.

Tekwav provides a fixed wireless service to over 1000 homes and businesses primarily in the rural areas of Grayson County, Texas that are unserved or underserved by either wireline carries or other internet service providers. We are utilizing unlicensed, lightly licensed, and licensed spectrum since 2013. We operate over 100 access point locations covering over 1200 sq miles. We offer speed from 4mbps download x 1mbps upload to 25mbps download x 5 mbps upload. We are only able to achieve our higher speed services in our rural areas utilizing our LTE equipment.

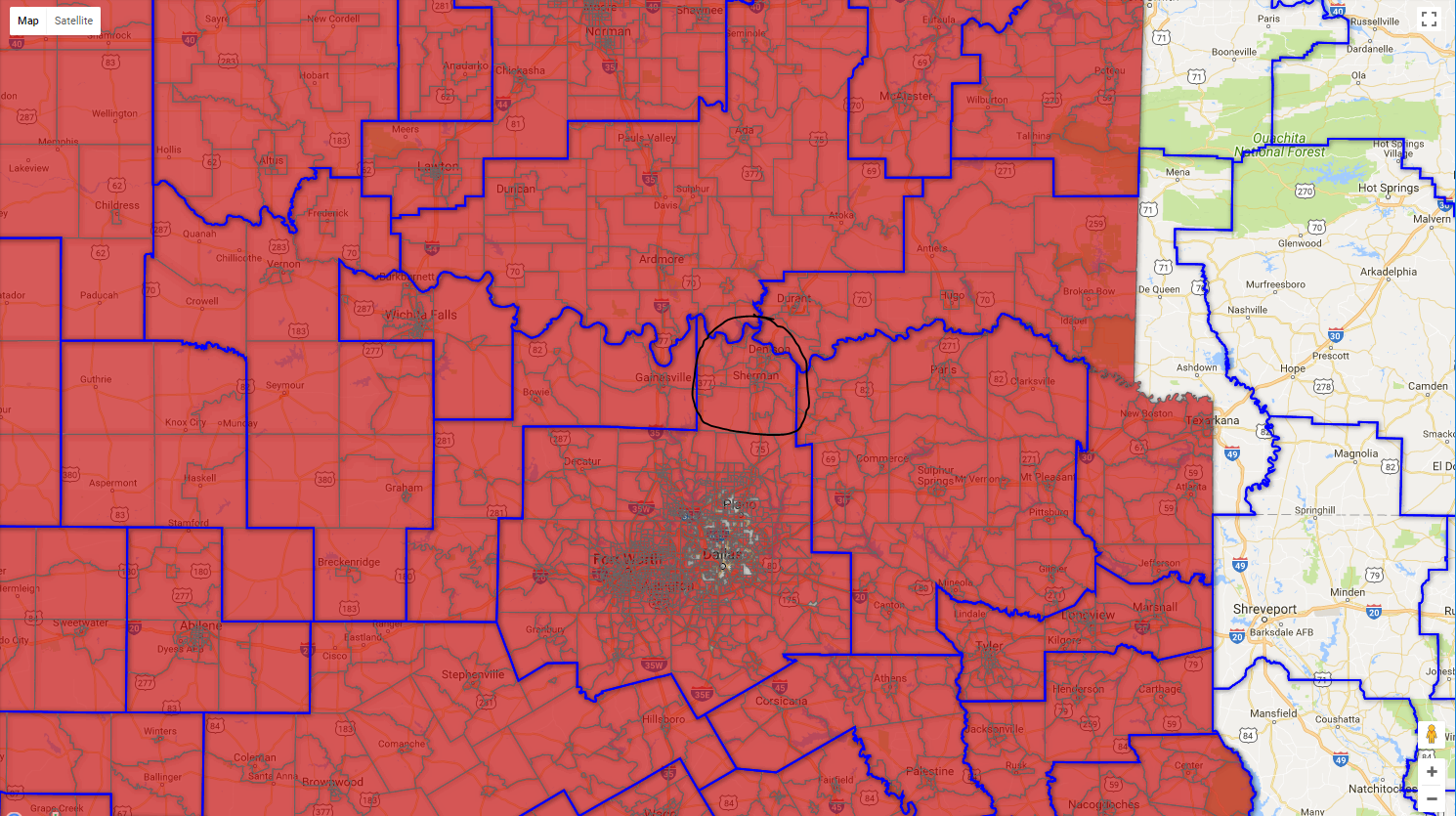
Most of the area we service with fixed wireless technology is rural and few competitive options with download speeds greater than 10mbps and reasonable data caps.

The following image is our current coverage area.



In early 2017, we began deploying LTE equipment in the 3.65-3.7GHz lightly licensed frequency that would be compatible with the CBRS rules adopted in 2015. While we were initially excited in the potential of this CBRS band, the recent NPRM for the band has caused us to pause and reconsider the viability of utilizing this band to service current and future clients. The proposed rule changes will significantly reduce our ability to acquire additional spectrum that we need to continue to grow our company offerings to those underserved and unserved customers.

On the following image, PEA coverage is outlined in blue, Census Tract coverage are gray lines, and our specific coverage area is the black circle.



You will see that our coverage area is only a small portion in each of the highlighted PEAs. A change in the CBRS auction rules to increase the size of PALs to PEAs would make it financially impossible for TekWav to acquire additional spectrum/licenses.

In order to acquire additional spectrum, we would need to purchase 4 PEA’s while only needing to purchase 29 Census Tracks that better fit our coverage area. Buying just the main PEA of our coverage area means that I would have the license to cover all of Dallas/Fort Worth and we have no intention at all to provide anywhere near those large cities. Like many small, regional operators, TekWav has no goals of being a large, potentially national player, or even a large regional operator. Using Census Tracts is a much more economical and financial method for WISPs to acquire PALs.

We support WISPA’s position regarding CBRS rules. We strongly OPPOSE the proposals to increase the size of PALs to the size of a PEA or even a county or to lengthen the term of Licenses. As a small business, we were planning to participate in PAL auctions based on census tracts. Having a 3 -year PAL based on the Census Tract size is the most equitable to operators of any size to provide service. Please provide us the opportunity to bid on PAL spectrum by Census Tracts, so we can continue to bridge the digital divide, other carriers have ignored.

Sincerely,

Joseph James McGrath II

Owner

Texoma Communications, LLC