



December 28, 2017

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12th Street, S.W.  
Washington, DC 20554

GN Docket No. 17-258

Dear Ms. Dortch;

I started SmarterBroadband a Wireless Internet Service Provider (WISP) 12 years ago because there were no internet providers covering rural areas of Western Nevada County other than satellite and dial-up. I operated for six months with 10 customers (who were my neighbors) to determine if a fixed wireless solution could be fast and reliable. It was, and now SmarterBroadband serves close to 3,000 customers with fast and reliable high speed internet. Our customers include the county, schools, fire stations, businesses and residential customers many who run home businesses.

Over the years we have upgraded our equipment and in 2014 we started our deployment of equipment operating in the 3.65GHz spectrum. This WIMAX equipment worked well and enabled us to offer increased speeds to customers who did not have clear line of sight to the serving towers. Today approximately 30% of our customers are using this CBRS spectrum, and to date we have invested approximately \$750,000 in CBRS equipment. We carefully researched vendors at the time and chose one with software defined radios that could be upgraded to LTE with a new software load. These radios will also be able to support the SAS database.

We were very excited about the future expansion of the band and what we will be able to do with the additional spectrum however we are now extremely worried about the October 24th 2017 NPRM that would fundamentally change the Citizens Broadband Radio Service (CBRS), which includes the 3550-3650 MHz band and the existing 3650-3700 MHz band.

We ask the commission not to change the rules. Please do not use PEAs as the basis for PAL license areas and instead, as originally planned use census tracts. The use of PEAs will harm the ability of smaller rural ISPs to obtain PALs and to continue to provide much needed rural internet. We also believe the PALs should be kept to 3 to 5 years license rather than 10 keeping the spectrum dynamic and limiting spectrum hoarding. Keeping block sizes small will result in more coverage areas being built out and will keep the availability alive for any provider, large or small to purchase licenses.

SmarterBroadband supports WISPs position in regards to CBRS rules. We strongly oppose the proposal to increase the size of PALs to PEAs.

Respectfully submitted,

Adam Brodel  
President & CEO  
SmarterBroadband, Inc.