



Andrew Kaiser, Owner

12/27/17

To:
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Referencing GN Docket No. 17-258

To all concerned parties at the FCC,

Ridgetop Networks is a small WISP in rural southern Missouri, primarily serving customers in a low-density rural region. We advertise speeds up to 15mbps, with 35mbps available to select subscribers, and we're preparing to widely offer 30mbps. Some of our coverage area has no wireline providers available, and cellular speeds and data caps are limiting for many internet users. Some areas have no cellular coverage at all, leaving satellite or a WISP as the only option. Satellite serves the purposes of some Internet users, to varying degrees of satisfaction, but it's severely limiting for professional use. Some companies don't allow their employees to work from home over satellite, and small businesses using satellite are often less productive than ones using a low-latency WISP or wireline ISP.

We primarily use 5 Ghz Part 15 equipment, reserving our 2.4 Ghz and 900 Mhz equipment for non-line-sight-customers. We've followed CBRS with interest for years. The increased transmit power, the propagation of the 3.65 Ghz band, the quality of the equipment on the market, and the purposed licensing for broadband Internet use all combine to make a potent package that can potentially allow us to overbuild our existing coverage area and offer much higher speeds to existing customers, as well as offer service to people we've previously turned away due to dense foliage, distance, and/or localized interference.

The most appealing feature of CBRS, for us, was the Census Tract-sized PALs. They would encourage the most efficient use of available spectrum and allow small providers to fill in gaps in coverage left by large carriers. We cover portions of 5 Census Tracts within two PEAs, but only cover about 1% of the total PEA population. The market value of a PEA license would be driven by the population clustered in a handful of large towns within the PEA, giving less incentive for the PAL-holders to deploy into the rural areas. Rural-focused local providers stand little chance of attaining PEA-sized PALs. **We strongly encourage the FCC return to the Census Tract-sized PAL that was originally recommended for CBRS.**

Also of high importance is the PAL period. 3-year licenses would encourage more rapid deployment to speed up ROI, and encourage competition by allowing competitors more opportunities to bid against incumbent providers that aren't utilizing their PALs. The up-front cost of 10-year licenses is also more burdensome on small providers. **We strongly encourage the FCC consider 3-year licenses for at least some of the PALs in all license regions.**

Sincerely,
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