Via ECFS

Marlene H. Dortch, Secretary

Federal Communications Commission

RE: GN Docket No. 17-258

445 12th Street, S.W.

Washington, D.C. 20554

Dear Chairman Pai & Commissioners Clyburn, O'Rielly, Carr & Rosenworcel:

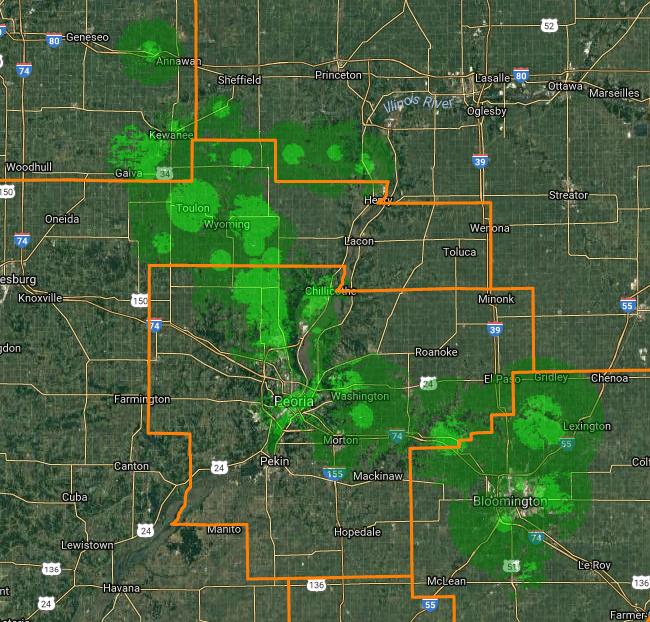
Our company, New Wave Net Corp. (NWNC) is a local Internet service provider that serves parts of 10 counties in central IL since 1999. While our service area includes the large cities of Peoria and Bloomington, we primarily serve residents, small business and anchor institutions in the rural areas where Comcast, ATT, Frontier and the mobile cell companies choose not to serve.

As a small business in a local community we employee local staff and contractors that grow the local economy and provide great customer service to our neighbors. We rely primarily on unlicensed spectrum to deliver broadband services to consumers that have few or no broadband

choices. We built our network from scratch using devices authorized under Part 15 in the 900 MHz, 2.4 GHz, and 5 GHz bands. We also have a light licensed NN 3.65 license where we have deployed Wimax gear originally and added some LTE trial gear in 2016. We had planned to add more 3.65 CBRS band capable LTE gear to 10 additional tower sites in 2017 but put that investment on hold due to the uncertainty of the FCC changing the rules in the middle of the game. We also lease an EBS 2.5Ghz license from a local school that covers a 35 mile circle around Peoria. We would like to lease more but all the other 2.5 spectrum in our market is controlled by Sprint and they are not interested in sub-leasing. This is a good example of why the mobile carrier’s position to make the PAL sizes large PEAs and then “maybe” they will lease the unused rural spectrum to others in the secondary market will not work. It has never worked in the past with the entire nation wide spectrum the mobile carriers have been sitting on in rural areas for the past 10 years!

We currently offer residential wireless speeds of up to 25 Mbps on our unlicensed spectrum with no data caps and need more spectrum in the CBRS band to increase speeds to our non-line of site LTE customers as well. In our hybrid rural ftth neighborhoods we offer up to a Gbps. This band is important to the future of our business and the additional spectrum will allow us to provide even faster speeds to our customers.

Our map below shows the coverage area of our Fixed Wireless network. Notice, in the map below we bridge the gap between the Urban and Rural areas of Illinois.



A change in the CBRS auction rules to increase the size of PALs from census tracts to PEAs would make it virtually impossible for NWNC to acquire any licenses. The current PEA boundaries shown above indicate we would have to obtain licensing in 5 areas, which go far beyond the existing NWNC wireless network. They also include the 5 largest cities closest to our network, Peoria, Bloomington, Davenport/Rock Island, Galesburg, and Ottawa. All 5 of these cities are areas in which NWNC has no desire to provide wireless coverage, due to the already existing service coverage by fiber and cable companies.

NWNC opposes the proposals to increase the size of PALs to the size of a PEA. As a small business, we were planning to participate in PAL auctions based on census tracts. Please provide us with a means to continue to bridge the broadband gap in rural Illinois providing service where the other carriers have largely ignored

Even large Telco’s like Windstream and Frontier in their filing agree “Preserving the Opportunity for Rural Fixed Wireless Deployments in the 3.5 GHz Band Is Consistent with the Commission’s and Congress’s Priorities in Closing the Digital Divide. “

As MIT professor Lehr notes in his filing,” the mobile carriers argument for maximizing PAL auction revenue to the Treasury if PEAs are used is not based on solid evidence.”

As the large WISP Rise notes in their filing “The FCC proposal to extend auctions to geographic areas the size of Partial Economic Areas (PEAs) on ten year terms with a renewal expectancy essentially takes businesses like ours out of the running for protected spectrum and hands it to the same few carriers that control it across our country today. The mobile carrier argument that America’s leadership in 5G relies on 3.5 GHz spectrum licensed by long term, large geographic areas with expected renewals is skewed. 5G’s success does not rely on specific spectrum bands, nor is it a technology exclusive to mobile carriers. It is an agnostic radio technology that will enable greater speeds and capacity with lower latencies in all bands across fixed and mobile applications. Companies like ours will be innovating and deploying 5G radios right alongside the mobile carriers. 23 million Americans in rural areas do not have access to broadband services, and nearly 50% only have the choice of one provider. Thousands of small businesses like ours serve millions of subscribers in rural America which drive their local economies, employ a local workforce, and gives them access to services they might not otherwise have. Why would the Commission even consider taking this spectrum opportunity away from the people that live and work in these communities and make it available to only multi-billion dollar companies clearly focused on densifying networks in cities and populous suburbs? “

We believe local small WISPs like NWNC are the FCC’s best option to bridge the rural broadband divide and provide consumers with competition diversity which will hold consumer prices in rural areas down and close to on par with urban rates. Remember mobile service is NOT equal to fixed service as can be clearly seen in mobile carriers definition of “unlimited service” being 22-25 GB of data a month or ATT’s new fixed wireless offering with a base price of $60 that goes up to as high as $200/month if you stream video or gaming and use high amounts of bandwidth like a fixed service.

Sincerely,

Garth Nicholas

CFO/Cofounder

New Wave Net Corp