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December 26, 2017

Marlene H. Dortch, Secretary

Federal Communications Commission

445 12th Street, SW

Washington, DC 20554

Re: GN Docket No. 17-258

Notice of ECFS Filing / Public Comment

Dear FCC Chairman & Committee:

Since 2005, TecInfo Communications has worked to meet the high-speed broadband needs of individuals in the Mississippi Delta who have not been served by other Incumbent Local Exchange (ILEC) or mobile wireless providers. For a majority of our customers in the rural Delta area, we are the only option for reliable broadband connectivity. Current service speeds include up to 25 Mbps download by 5 Mbps upload, and TecInfo’s 1,250 customers depend on our access to a competitive 3.65 GHz frequency band. Since 2016, TecInfo has made a substantial $32,000 dollar investment in 3.65 GHz technology. This investment represents our commitment to bringing the fastest, most reliable Internet service to a historically underserved rural population. Our purchases have been made wholly-based on the FCC’s April 2015 CBRS ruling that our software upgradable 3.65 Ghz LTE equipment will still be usable under the current ruleset – eliminating the need to purchase more hardware and keep current customers broadband access uninterrupted.

The TecInfo Communications Fixed-Wireless Internet coverage area extends from approximately five miles South of Clarksdale, MS to Vicksburg, MS and East to Hwy 49E (Yazoo City, MS). Our coverage area also includes portions of the Arkansas Delta as well. Much of the terrain in our coverage areas is flat farmland or gently rolling hills. The largest obstacle to providing Line-of-Sight (LoS) Fixed Wireless Service is tree density and height. Connecting homes that are positioned in heavy tree coverage to our high-speed data network has been all but impossible with the existing 2.4 GHz and 5.8 GHz wireless technology. The introduction of 3.65 GHz, technology has allowed us to deploy LTE cells that are able to better reach homes in Non-Line-of-Sight (NLoS) conditions. These homes will no longer have access to reliable high-speed broadband should the FCC reposition the CBRS band to favor large Mobile Wireless Carriers.

The existing rules for the 3.65 GHz mid-band spectrum, specifically the auctioning of Priority Access Licenses (PALs) allows for competitive bids by Wireless Internet Service Providers (WISPs) for per census block. The proposed expansion of these tracts to PEAs, which cover a much larger area, will disenfranchise WISP companies that are unable to serve a larger geographic area. This favoritism for national mobile wireless carriers will certainly frustrate TecInfo’s ability to further deploy and expand our high-speed Internet service to individuals who remain underserved by the national carriers. In many cases the proposed, expanded, license areas will cover a much larger area than we would be able to serve. Additionally, increased license terms would further perpetuate the issue of obtainability for WISPs, with a 10 year length and expected renewal clause. Without the available 100Mhz of PAL spectrum, frequency coordination for LTE Carrier Aggregation (using two separate 20Mhz channels) would be impossible, as the proposed GAA spectrum is only 30Mhz wide. Limiting this technology to the national wireless providers would certainly slow the momentous progress that WISPs have made towards providing the same urban connectivity speeds to a primarily underserved rural market.

In conclusion, TecInfo Communications is opposed to the FCC’s proposed changing of the established CBRS ruling in favor of national mobile wireless carriers, who are requesting larger PAL blocks for larger, mandated coverage areas, and longer license terms, to keep the spectrum perpetually unavailable to WISPs. We believe this action would be in direct conflict with the best interest of those individuals who will not be the target of coverage by mobile carriers intending to deploy a “5G” product that is not intended for rural broadband access.

Sincerely,

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