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December 28, 2017

RE: Roller Network's Comments on Proceedings 17-258

FCC Commissioners,

Roller Network is a local company based in Reno, NV and also serving Sparks, NV. We're a small company of 4 people, but we effectively serve customers ranging from individuals all the way up to large hospitality, aerospace, healthcare, and corporate customers. Additionally, we operate the only true local carrier neutral colocation datacenter in Reno, NV. We meet these challenges with superior customer service and flexibility that often eludes large companies. The services we provide to our hometown are personal to us. We are proud to be a local business in Reno and likewise take pride in the services we offer. Roller Network is not a company with a distant head office that just sees customers in our city as numbers. At Roller Network we know our customers as individuals.

We started to expand our investment in 3.65GHz "NN" equipment that would be capable of operating in the expanded band when the CBRS rules were adopted in 2015. The CBRS band is not just a benefit for rural areas. Roller Network covers select areas within the cities of Reno and Sparks, Nevada. Our largest concentration of users are business customers in industrial areas of Sparks, NV, where often the only option for connectivity is slow DSL that can't meet the needs of today's internet. Many of these are also local businesses, like us.

Roller Network strongly opposes the changes to CBRS put forth by T-Mobile and the CTIA that favor their industry: specifically using PEAs over census tracts, and 10 year PALs with renewal expectation over 3 year PALs.

We disagree with the assertion that such changes are needed for 5G deployments. In fact, there is no impact to such deployment plans, as everyone has the same opportunity to deploy CBRS services. Census tracts allow for targeted use of the spectrum where it's needed the most. Roller Network can

utilize PALs in census tracts immediately to provide enhanced services to our customers. Quality is often more critical than quantity when dealing with real time services like VOIP and videoconferencing that our customers depend on.

We also disagree with the assertion that changes are needed for investment in the CBRS band. This is clearly false. Roller Network, and many other companies like us, have already invested in equipment that can operate in the CBRS band. We are operating today with this equipment, which was purchased with the intent to operate it under the CBRS rules adopted in 2015. It's blatantly incorrect for T-Mobile and the CTIA to state rule changes are needed for "investment" when it can be shown that investments have already been made in equipment today that will utilize CBRS tomorrow.

Moving to PEAs with 10 year PALs will increase the cost to obtain a PAL, likely beyond what Roller Network could afford. Forcing us to consider PEAs that include areas outside of our covered areas will increase costs. Census tracts are ideal for innovative, targeted use of the CBRS band which together with short 3 year lengths, discourage the act of "spectrum hoarding".

In the cellular industry, tying up spectrum is often done to create an "asset" with token deployments to be "in compliance". We faced this problem earlier in 2017 when Verizon took all of Straight Path's licenses in the 39GHz band. Roller Network had been negotiating with Straight Path for spectrum leases in order to expand service offerings in our area. We had agreed to purchase equipment designed coverage areas and lined up customers for deployment, only to have our plans discarded by Verizon purchasing the licenses. We don't want to see the same thing happen to the CBRS band, which the changes that T-Mobile and the CTIA propose would favor their industry in a similar manner. The cellular and mobile industry would like you to think that they're the only ones capable of using CBRS, however, that is clearly false as demonstrated by the number of operators standing ready to use it now to offer competitive services.

By rejecting the changes proposed by T-Mobile and the CTIA - and sticking to the original 2015 CBRS rules - you will be ensuring that the band truly remains the Citizens Broadband Radio Service.

Sincerely,

Seth Mattinen, CTO
Roller Network LLC