



Royell Communications, Inc.

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December, 28 2017

Re: CBRS NPRM GN Docket No. 17-258

To: FCC Commissioners

Ajit Pai

Mignon Clyburn

Michael O'Rielly

Brendan Carr

Jessica Rosenworcel

Dear Commissioners,

Royell Communications Inc is a small business, founded in 1999, and currently employing 21 people in central Illinois. We are a WISP providing fixed wireless commercial and residential broadband internet service to 5500 customers in 6 rural counties. The counties we cover are Sangamon, Macoupin, Montgomery, Morgan, Greene, and Scott. In addition we offer digital phone service, Directv, and Dish installations. Many of our customers have no other land based internet option.

Recently we purchased the Vince Demuzio Broadband network which was originally conceived and funded by the State of Illinois to bring broadband speeds to Macoupin and Montgomery counties in Illinois. Our company has been involved in this project from its conception, first as the sole construction company, and then as the retail operator of the network. The project consists of 12 sites all linked by FCC licensed 11Ghz radios and utilizing 48 Motorola Access Points operating in the 3650-3700 Mhz band.

In addition our company has deployed an additional 48 access points operating in the same band. Our investment in customer radios, access points, and supporting equipment exceeds 1 million dollars and provides service to over 2000 customers. We would like to update some of the older Wimax technology and add more sites utilizing the new CBRS rules. We are sending this letter to ask that you keep the 2015 CBRS rules.

We operate in many census tracts but we would not have the financial means to bid against the cell carriers if the rules are changed as proposed in the NPRM 17-258. The dozens of census tracts we currently provide service to would be changed to 2 large PEA areas. Each of these areas have close to 450,000 people and the cell companies would obviously bid above our means.

We have suspended purchases of 3.65 Ghz equipment as we wait for your determination in this NPRM. We are confident we could upgrade speed packages and add hundreds more customers if we are allowed bid on census tracts and not PEA areas.

Respectfully yours,

Joe Royer

President, Royell Communications, Inc.