

**Before the
DEPARTMENT OF COMMERCE
National Telecommunications and Information Administration**

Development of a National Spectrum Strategy
Docket No. 230308-0068

California Internet, L.P. (U-7326-C) dba GeoLinks (“GeoLinks” or the “Company”) respectfully submits these brief comments in response the Request for Comments (“RFC”) to provide its recommendations to the National Information and Telecommunications Administrative (“NTIA”) regarding the development and implementation of a National Spectrum Strategy (NSS) for the United States.¹

GeoLinks is an enterprise-level telecommunications company nationally recognized for its innovative Internet and Hosted Voice solutions. The Company is ranked on the Financial Times' 2023 list of America's Fastest-Growing Companies and is the country’s largest holder of Active LMDS Licenses in the 29/31 GHz Bands. GeoLinks believes that expanding licensed spectrum access for wireless technologies is key to ensuring ubiquitous availability of high-speed broadband and innovation to meet consumer needs going forward. As such, GeoLinks urges the NTIA to craft an NSS that will afford all service providers the opportunity to leverage spectrum assets to expand their service offerings.

Current spectrum availability is insufficient to support future needs. As more people are getting online, as bandwidth needs for day-to-day use of the internet increase (i.e. streaming services, virtual meetings, new applications, etc.), and as more and more electronic devices become “smart” additional spectrum resources will be required. To meet the growing demands of an ever-more-connected society, GeoLinks urges the NTIA to craft policy that will increase access to licensed spectrum for small and medium sized service providers.

Licensed spectrum has significant benefits over unlicensed or shared spectrum. Access to dedicated spectrum on a licensed basis allows wireless providers to utilize clean spectrum connections to deliver robust, highspeed service. GeoLinks has had success using licensed spectrum for point-to-point (“P2P”) wireless connections for a variety of users. In urban settings, GeoLinks has used these types of connections to deliver business-class services. In rural settings, the Company has used P2P connections to deliver long-haul middle-mile

¹ See 88 Fed. Reg. 16244 (March 16, 2023).

connections, as well as last-mile connections to connect rural schools throughout California that previously had not had access to any highspeed broadband service. In both instances, having access to clean spectrum for dedicated purposes has allowed GeoLinks to offer highspeed broadband solutions of identical quality to fiber connections for a fraction of the cost.

However, while P2P connections have been successful, this approach is limited in its application. Specifically, P2P connections are cost effective for a single connection point (e.g. one school, community anchor institution, or business), but they are not, comparatively, for multiple connections (e.g. multiple residences throughout a community) as they require additional equipment and infrastructure to reach the additional users. Point-to-Multipoint (“P2MP”) connections, on the other hand, create opportunities to connect multiple users from one transmission point without the need for additional infrastructure. This may include numerous homes or buildings within a densely populated area or homes in rural areas that are, sometimes, miles apart.

Unfortunately, dedicated licenses for P2MP connections have not been easy for fixed wireless providers to obtain. Currently, opportunities to obtain the right to use licensed spectrum are few and far between. When there are spectrum auctions (which are not frequent), large companies with equally large amounts of capital are able to easily outbid smaller, competitive companies. The result, historically, has been that these smaller providers are relegated to the use of a few unlicensed spectrum bands or can only obtain P2P licenses while large carriers control the majority of available spectrum. While bidding credits have been available for smaller companies and companies serving primarily rural areas, these credits are not enough to offset how high large companies are willing to bid. In addition, while secondary market options do exist, it requires a spectrum holder to be willing to sell/ lease their spectrum assets.

GeoLinks asserts that making more, affordable licensed spectrum available for small and medium sized companies would be beneficial to deliver “future services or capabilities of concern to stakeholders.”² More licensed spectrum availability will, in turn, spur investment and innovation in more wireless technology and equipment specifically geared towards available bands. This will allow small and medium sized service providers to offer cutting edge broadband connections and applications, which will promote competition and expansion of existing network footprints.

² *Id.*, at 16245.

Clearly, access to more spectrum resources will both promote innovation and help service providers close the Digital Divide, both issues that GeoLinks knows are priorities for the NTIA. As such, GeoLinks encourages the NTIA to craft policy that will promote expanded access to licensed spectrum for small and medium sized companies.

Respectfully submitted,

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