

December 7, 2022

The Honorable Maria Cantwell The Honorable Roger Wicker

Chair Ranking Member

Committee on Commerce, Science Committee on Commerce, Science
and Transportation and Transportation

511 Hart Senate Office Building 555 Dirksen Senate Office Building

Washington, D.C. 20510 Washington, D.C. 20510

Dear Chair Cantwell and Ranking Member Wicker:

We represent small and medium-sized innovative Internet Service Providers (ISPs) that rely on valuable spectrum resources to connect communities across the country to the services needed to thrive in a modern society and economy.

As Congress considers legislation to reallocate federal spectrum for sharing with commercial use, we are very troubled by proposals that would restrict the use of spectrum to only the largest national mobile cellular carriers and leave millions of Americans behind.

Today, thousands of small and medium-sized wireless ISP (WISP) businesses across the country deliver reliable high-speed broadband services to more than nine million homes, businesses, community institutions, first responders and much more, in areas of the country where other ISPs have chosen not to invest despite the need.

As the “first responders of connectivity,” our companies work in the frontier of the digital divide, connecting our neighbors and communities, while other service providers have simply not seen the need or been unwilling to take the risk.

We ask that you support legislation that allows small and medium-sized businesses like ours to continue providing broadband to customers who would otherwise lack access. In particular, we urge you to support an approach to spectrum use similar to the successful Citizens Broadband Radio Service (CBRS) spectrum sharing model used in the 3.55-3.7 GHz band for future spectrum bands, including 3.1-3.45 GHz.

Recent proposals from the nation’s largest mobile cellular carriers would result in only a handful of companies gaining access to limited spectrum. Without access to additional usable spectrum, like that in the lower 3 GHz band, small and medium-sized businesses like ours may be precluded from expanding our offerings to the millions of truly unserved

Americans desperately in need of connectivity. Fortunately for policymakers, there is a blueprint for success.

A CBRS structure allows for both large and small providers to deliver services where they are needed. It provides a foundation for smaller-sized auction areas, such as counties or census tracts, but preserves license-like attributes; and it enables the possibility of regulated, licensed- by-rule access to all as provided in CBRS by GAA where incumbents are highly protected.

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Indeed, the overall CBRS structure, an example of true spectrum sharing, has been a tremendous success and continues to grow.

In just the first three years after the FCC authorized commercial equipment in the CBRS band, over 285,000 CBRS radio devices known as CBSDs already have been deployed for a wide array of use cases in a variety of industries including residential, retail, hospitality, healthcare, transportation, energy, education, and many more. Just as important, the CRBS structure has allowed usage by large providers and small providers alike – resulting in a win-win situation for all.

Allowing for true spectrum sharing between federal and non-federal users empowers small broadband providers to deploy robust services to unserved and underserved areas. It also demonstrates the ability to fully utilize spectrum rather than leave much of it lying fallow – as has occurred in many prior spectrum allocations.

For these reasons, we respectfully ask that you reject calls by those asking for the entire band to be auctioned for use by only a few of the largest companies who have repeatedly turned a cold shoulder to Americans living in the nation's most rural and hard-to-reach areas. Instead, we urge you to support legislation that allows small and medium-sized businesses like ours the opportunity to access spectrum in the 3.1-3.45 GHz band.

Respectfully submitted,

Borealis Broadband
Snowcloud Services, LLC

Elev8 Networks
Fort Code Inc DBA Weiss Internet Rapid Wireless, LLC
South East Wireless
Aristotle Unified Communications, LLC AirFiber WISP

Easy Systems, Inc/Truss Communications, Inc/Truss Infrastructure, Inc/Hayai Ltd

Free Range Internet
GeekFi Internet
Hi-Speed.us, LLC dba TKS Internet Service

Anchorage, AK Juneau, AK Hoover, AL Centre, AL Hartford, AL Dothan , AL Little Rock, AR
Phoenix, AZ

Tucson, AZ
Ajo, AZ
Mesa, AZ Colorado City, AZ

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Interstate Wireless Inc. Mojo Broadband Phoenix Internet Ziplink Systems, LLC Accel
Wireless Advanced Wireless Cal.net

Cosner-Neipp Corporation
Etheric Networks
FractalVision Technology Services
Happy Cycling LLC DBA SeaKay Broadband Jelly Digital

Kiza, Inc.
Mojavewifi.com, LLC OACYS Technology OptiStreams, Inc.
RWSI
Surfnet Communications Tekify Fiber & Wireless Wilson Creek Communications Wireless
Internet Services, Inc. Zeta Broadband, Inc.
3-dB Networks, Inc
Cityless Internet Services, LLC Nimbus Solutions
Optimus Communications ZIRKEL Wireless, LLC Wrizzle, inc

Tempe, AZ Scottsdale, AZ Phoenix, AZ
Queen Creek, AZ Temecula, CA Santa Maria, CA Shingle Springs, CA Ridgecrest, CA

San Mateo, CA Agoura Hills, CA Ukiah, CA
Chula Vista, CA Santa Ynez, CA Joshua Tree, CA Porterville, CA Clovis, CA Delhi, CA

Los Gatos, CA Hayward, CA Atascadero, CA Visalia, CA
Rancho Murieta, CA Frederick, CO Canon City, CO Durango, CO

Grand Junction, CO Steamboat Springs, CO New Milford, CT

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DC Access LLC
BluBroadband ISP
CBN-Volusia
Crisman Company dba DSI Communications Ethx.Biz

Florida Broadband, Inc.
Open Wireless
OPUS Fiber LLC
Rango Broadband, LLC ROAMR Wireless & Broadband SJP Network Solutions SKYNET360

Snappy Internet & Telecom Streamline
Vision ISP, LLC
Webgears Internet

West Orange Wireless, Inc
Highspeed Country Internet Communications Integrated Technology 2pifi, Inc.
Grand Mound Communications
Natel, Inc.
Night Owl Wireless, LLC
Router12 Networks LLC
CTC Telecom
Kaniksu, LLC

BLIP Networks, LLC
DNA Communications

Washington, DC
Fort Walton Beach, FL Edgewater, FL Odessa, FL
Cape Coral, FL
Vero Beach, FL Windermere, FL Surfside, FL
Miami, FL
Spring Hill , FL
Fort Walton Beach, FL Homestead, FL Miami, FL
Naples, FL
Marianna, FL
Hobe Sound, FL Winter Garden, FL Buchanan, GA Hagatna, GU
Cedar Rapids, IA Grand Mound, IA Fairfield, IA
Walcott, IA
Mason City, IA Meridian, ID
Hope, ID Murphysboro, IL Rochelle, IL

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Everywhere Wireless, LLC Intelligent Computing Solutions KWISP Internet
New Wave Net Corp

Wireless Data Net, LLC
Wisper ISP
Community Wireless of Charlestown Llc
Fast Lane Internet
Fourway Computer Products, Inc.
GRiT Technologies
Joink, LLC
Lakeland Internet
Metro FastNet, LLC
Monon Telephone Company Inc.
On-Ramp Indiana, Inc.
Outernet Broadband
SCC Technologies Corporation

Wabash Heartland Innovation Network
Blackdragon Networks, LLC
Brolly Communications
KC Wisp
Network Tool and Die Company, Inc.
BIGBLUE WIRELESS, LLC
White Cloud Communications US, LLC DBA Broadlinc 318 highspeed LLC
Acadiana Wireless
Faster Cajun Networks
Netafy, Inc

Chicago, IL DeKalb, IL
Glen Ellyn, IL Bloomington, IL Saybrook, IL Mascoutah, IL Charlestown , IN Francesville, IN
South Bend, IN Rushville, IN Terre Haute, IN Angola, IN

New Albany , IN Monon, IN Noblesville, IN Palmyra, IN Merrillville , IN West Lafayette , IN
Jetmore, KS Louisburg, KS Olathe, KS

North Newton, KS Berea , KY Owenton, KY Minden, LA Opelousas, LA Lake Arthur, LA
Bridgewater , MA

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Omnipoint Technology Inc TCC Networks, Inc. Fibercreek Networks, LLC RiverNet

SkyPacket Networks Inc.
Redzone Wireless
Cherry Capital Connection, LLC
Orange Cloud
RuralReach.com
ShoreWaves Internet and Telephone
SyncWave, LLC
Broadband Corp
MVTW Wireless
Northern Network Concepts, Inc.
Southeast MN Wifi, LLC

Treehouse Broadband, LLC
BPS Networks
Isotech Inc/KCCoyote Inc
Liberty Link, LLC
Ozark Mountain Internet
Ridgetop Networks, LLC
Systec Wireless Communications, LLC
The Foerster Project, LLC DBA Patriot Broadband WON Communications, LLC
North Lauderdale Wireless Internet
TecInfo Communications, LLC
Horizon Wireless
IP Routing LLC

Springfield, MA Bridgewater , MA Cumberland, MD Georgetown, MD Cumberland, MD
Rockland, ME Elk Rapids, MI Auburn Hills, MI Saline, MI Houghton, MI Scottville, MI
Victoria, MN Granite Falls, MN Little Falls, MN Hastings , MN Ely, MN

Bernie, MO Kearney, MO Holden, MO Ava, MO Mansfield, MO Troy, MO Forsyth, MO
Springfield, MO Bailey, MS Leland, MS Eureka, MT Eureka, MT

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Montana Internet Corporation MontanaSky Networks, Inc. Open Broadband LLC Eastern
Carolina Broadband Northern Skies Wireless Skywave Wireless Inc. Vistabeam

New England Wireless Co. LLC NMSurf, Inc.
Straight Shot Wireless
LTD Broadband LLC

LV.Net
Net NV, LLC
CBN Geneva LLC
Hudson Valley Wireless
Telrad Networks
Byhalia.net, LLC
DigitalC

DSI Stream
Imagine Networks, LLC
iZone Broadband LLC. MetaLINK Technologies, Inc. New Era Broadband, LLC NKTelco
Northwest Ohio Broadband LLC Smart Way Communications Wavelinc Communications,
LLC Airosurf Communications

Helena, MT Kalispell, MT Oak Island, NC Pink Hill, NC Bismarck , ND West Point, NE Gering,
NE Etna, NH

Santa Fe, NM Roswell, NM
Las Vegas, NV Las Vegas, NV Reno, NV Geneva, NY Albany, NY Delmar, NY Bellefontaine, OH
Cleveland, OH Kent, OH

Troy, OH Centerburg, OH Defiance, OH Pomeroy, OH
New Knoxville, OH Coldwater, OH Uhrichsville, OH Bucyrus, OH Edmond, OK

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Arbuckle Communications, LLC Grice Enterprises LLC ProValue.Net
The Junction Internet

Actual Broadband
Stump Internet LLC
Tnet Broadband Internet
Webformix Internet Company
Crownsnest Broadband LLC
Eastern Time Inc
ICON Technologies, Inc.
Nittany Media, Inc.
Revolt Wireless, LLC
River Valley Internet
Susquehanna Broadband, LLC
Xtreme Internet
Aeronet Wireless Broadband LLC
Webiffi, LLC
ClearLink

Interlakes Wireless LLC
Altitude ISP
AW Broadband
B & B Communications LTD dba Autophone of Laredo Backroads Broadband
Centex Web Access
Cirra Networks
Cobalt Ridge
Community Internet Providers, LLC.

Ardmore, OK Idabel, OK Stillwater, OK Vinita, OK
The Dalles, OR Coos Bay, OR Lakeview, OR Bend, OR Woodbury, PA Allentown , PA
Carbondale, PA Lewistown, PA Gettysburg , PA Williamsport, PA Northumberland, PA
Wellsboro, PA Guaynabo, PR

Cabo Rojo, PR Anderson, SC Chester, SD Hewitt, TX Amarillo, TX Laredo, TX Corsicana, TX
Marlin , TX
Fort Worth, TX Wichita Falls, TX Wills Point, TX

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Falcon Internet
Fiber Wave, LLC
Gtek Communications
JackRabbit Wireless, LLC
LinQ Antenna Technology Inc
Net Ops Communications, LLC
Nextlink Internet
Texoma Communications, LLC dba TekWav Triple Crown Internet, Inc.
VGI Technology, Inc.
WavSpeed, Inc.
Zion Broadband, Inc.
9Stone LLC
Barlow Communications
BEH Communications, LLC
Dot Bar Communications
InfoWest

Intellipop, llc
River Canyon Wireless
Fastlink Communications LLC.
GigaBeam Networks, LLC
Piedmont Broadband
Smyth Technology Group, Inc. DBA SmythNet Seiontec Systems LLC
Telpage, Inc.
Cloud Alliance LLC
Advanced High Speed Internet
Metownet.com

Salado, TX Crosbyton, TX Portland, TX
El Paso, TX Kerrville, TX Midland , TX Hudson Oaks, TX Sherman, TX Plains, TX

San Angelo, TX Tuleta, TX Seminole, TX Grantsville, UT
St. George UT, UT Price, UT Randolph, UT

St George, UT Payson, UT Moab, UT Cana, VA
Rich Creek, VA Sperryville, VA Marion, VA Lynchburg, VA Emporia, VA Stowe, VT Yakima,
WA Winthrop, WA

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Native Network, Inc. xyTel, LLC Acrospire Networks AirFiber, Inc. Bayfield Wireless
Ethoplex

Network Professionals, Inc. Ascent Technical Services, LLC BridgerValley Electric
Association Mountain West Technologies Wyoming.com

Wenatchee, WA Kennewick, WA Denmark, WI Superior, WI Bayfield, WI Germantown, WI
Wausau, WI Cheyenne, WY Mountain View, WY Casper, WY Riverton, WY

cc: The Honorable Ben Ray Lujan, Chair, Subcommittee on Communications, Media and
Broadband

The Honorable John Thune, Ranking Member, Subcommittee on Communications,
Media and Broadband

The Honorable Frank Pallone, Chair, Committee on Energy and Commerce

The Honorable Cathy McMorris-Rodgers, Ranking Member, Committee on Energy and
Commerce

The Honorable Mike Doyle, Chair, Subcommittee on Communications and Technology

The Honorable Bob Latta, Ranking Member, Subcommittee on Communications and
Technology