

Aeronet Wireless Broadband LLC

Statement in Support of Experimental License Application

Aeronet Wireless Broadband LLC (“Aeronet”), pursuant to Section 5.63(c)(1) of the Commission’s Rules, provides this statement in support of its application for experimental license to conduct a technology trial using spectrum in the 3550-3650 MHz band transmitting from five existing access point locations in the San Juan, Puerto Rico area. Aeronet requests license term equal to the shorter of (a) twelve (12) months from grant of this application, or (b) Aeronet’s grant of authority from a Spectrum Access System (“SAS”) and Environmental Sensing Capability (“ESC”) to operate the authorized equipment and facilities on a General Authorized Access (“GAA”) or Priority Access License (“PAL”) basis.

Background

Aeronet is a fixed wireless service provider that provides broadband service to approximately 8,000 customers in Puerto Rico. It relies on a combination of unlicensed and lightly-licensed spectrum and fiber optics to provide these services. Aeronet is the auction winner for a number of PALs in Puerto Rico and plans to deploy once the SAS and ESC are operational and approved by the Commission to enable licensed and GAA operations in Puerto Rico.

Aeronet previously applied for and was approved for Special Temporary Authority (“STA”) to conduct the same trial it seeks here (Call Sign WQ9XOX). That authority expires December 2, 2020. Aeronet requires additional time to evaluate equipment capability ahead of its planned major roll-out of fixed wireless services throughout Puerto Rico. Because an experimental STA cannot have a duration of greater than 180 days, Aeronet submits the instant application for experimental license under which it may continue to evaluate equipment capabilities and applicability to Aeronet’s planned operations.

To prepare for commercial launch, Aeronet intends to experiment with access point and customer premise equipment (“CPE”) on the Cambium Networks platform. Based on its STA, research and understanding of the technical rules for CBRS, Aeronet believes that this platform can be a successful deployment option, and that in mid-band spectrum may offer consumers the best combination of throughput, propagation, cost and performance in areas where access to competitive broadband services is lacking. As it continues to restore and improve fixed broadband service in Puerto Rico, Aeronet expects to gain a better “real world” understanding of the benefits, challenges and costs associated with deployment of the equipment.

Trial Objectives

Aeronet has identified the following objectives of the proposed trial:

- Test CBRS RF propagation characteristics in line-of-sight and non-line-of-sight environments
- Test CBRS RF propagation characteristics in indoor and outdoor installation scenarios

- Test CBRS three 20-megahertz channel carrier aggregation capability and performance
- Validate ability to offer 100/25 Mbps speed with CBRS carrier aggregation
- Compare performance with the BlinQ equipment used in a previous trial.
- Develop a use case to encourage more expeditious deployment of the ESC in Puerto Rico

Overall, this new authorization will provide Aeronet with additional information to help make its future equipment, expansion and network investment plans. Assuming the trial is successful and an SAS and ESC are authorized for Puerto Rico, Aeronet plans to utilize its licensed PAL spectrum and GAA across the entire 150 megahertz of 3550-3700 MHz spectrum.

Aeronet believes that the ability to share the 3550-3700 MHz band under the control of the SAS and ESC represents a positive change in spectrum management policy and will eventually result in extremely efficient and widespread use of this 150 megahertz of spectrum for both small cell technologies for mobile wireless broadband and higher power technologies for fixed wireless broadband in rural and underserved locations. As a fixed wireless broadband provider, cost-effectiveness is an important factor in Aeronet's future deployment and investment decisions.

In order to meet the defined objectives of the trial, Aeronet seeks a new experimental authorization to use spectrum in the 3550-3650 MHz band, transmitting from the five access point locations identified in this application. Aeronet plans to deploy Cambium Networks equipment and a DPA-enabled SAS on an experimental basis to determine equipment and technology performance and the market potential resulting from additional mid-band spectrum. In sum, this experiment will inform Aeronet's business, investment, technology and deployment decisions as it plans to restore, expand and upgrade its fixed broadband network. It will also inform ESC administrators on whether the market in Puerto Rico justifies the investment for deploying the ESC.

Description of Trial

Aeronet plans to trial Cambium Networks transmission equipment from five locations. Power limits and out-of-band emission limits will conform to the Part 96 rules for Category B CBSDs that the Commission adopted in the *CBRS Order* and the Order on Reconsideration and Second Report and Order.¹

Aeronet will conduct the experiment in its existing area of operations in the San Juan area of Puerto Rico. Aeronet has access to and is transmitting from existing towers and operation in this area with personnel on site to monitor deployment and operation, which will ensure that there will be no harmful interference to Incumbent Access users, and to remedy harmful interference in the unlikely event it occurs. Commission records show that there are no Fixed Satellite earth stations in the 3600-3650 MHz band operating near the test area.² Likewise, there appear to be no ground-

¹ See *Amendment of the Commission's Rules with Regard to the 3550-3650 MHz Band*, Order on Reconsideration and Second Report and Order, 31 FCC Rcd 5011 (2016).

² See *Amendment of the Commission's Rules with Regard to the 3550-3650 MHz Band*, Notice of Proposed Rulemaking and Order, 27 FCC Rcd 15594 (2012), at Appendix A.

based radar facilities in or near the planned trial area that would require ESC or coordination with incumbents.³

To the extent necessary, Aeronet agrees to accept the following special condition on its experimental license:

Licensee shall be aware that FSS earth stations are licensed on these frequencies and if any interference occurs, the experimental licensees of this authorization will be subject to immediate shut down.

Contribution to the Radio Art

In accordance with Section 5.63(c)(1), Aeronet expects that the trial will add to what had been learned in the previous STA and inform the development of the ESC for deployment in Puerto Rico, and will further contribute to the radio art. CBRS is a new service in which commercial and Federal uses will share a spectrum band, with use governed by an SAS and ESC. In connection with its market trial, Aeronet expects to learn a significant amount of information about equipment capabilities and limitations, interference protection and mitigation, customer acceptance at various speeds and price points, and integration of its service and equipment with the SAS and ESC. Because Aeronet will make test data available to Cambium Networks, the manufacturer also will gain important information that can be used to improve equipment performance and development.

³ See Letter dated from Paige R. Atkins, NTIA, to Julius P. Knapp, FCC, GN Docket No. 12-354 (dated March 24, 2015), at Enclosures 1 and 2.

Deployment Parameters

The current stage of the experimental trial proposes operation from five additional sites. Specific parameters of proposed operation are detailed in the chart below:

Location 1 – Claro SP	
Coordinates	18-24-42.63 N/ 66-5-38.03 W
Beam Width	90° V 8° H
Azimuth	0°, 90°, 180° and 270°
Orientation in Vertical Plane	4°

Location 2 – CC Montehiedra	
Coordinates	18-20-46.65 N / 66-4-17.74 W
Beam Width	90° V 8° H
Azimuth	0°, 90°, 180° and 270°
Orientation in Vertical Plane	4°

Location 3 – SBA Coqui	
Coordinates	18-20-28.90 N / 66-3-20.73 W
Beam Width	90° V 8° H
Azimuth	0°
Orientation in Vertical Plane	4°

Location 4 – SBA Efron (Dorado)	
Coordinates	18-27-18.60 N / 66-17-24.07 W
Beam Width	90° V 8° H
Azimuth	0°, 90°, 180° and 270°
Orientation in Vertical Plane	4°

Location 5 –Filtros (Guaynabo)	
Coordinates	18-22-38.66 N /66-7-.91
Beam Width	90° V 8° H
Azimuth	0°, 90°, 180° and 270°
Orientation in Vertical Plane	2°