

California Internet, L.P. dba GeoLinks
Statement in Support of Special Temporary Authority

Pursuant to Section 5.61 of the Commission's Rules, California Internet, L.P. dba GeoLinks ("GeoLinks") hereby provides this narrative statement in support of its application for Special Temporary Authorization ("STA") to conduct a product development trial, as defined in Section 5.5, using spectrum in the 10.005-10.04 and 11.7-12.1 GHz bands from specified locations in and around Simi Valley, CA, in accordance with the technical and operating parameters described below and in the accompanying FCC STA Request Form. GeoLinks requests an STA of three (3) months to permit some flexibility in the start date but anticipates that testing will occur within a 6-day trial period. Currently, GeoLinks is planning to commence the trial on March 15, 2020. However, the longer timeframe is specified in order to allow for unexpected delays.

Overview

GeoLinks is an internet and digital voice service provider located in California. It is currently one of the fastest growing service providers in America and the fastest growing provider of fixed wireless service in the state of California. In 2016, GeoLinks set its sights on expanding its customer base in unserved and underserved areas throughout California and beyond. As part of this new mission, GeoLinks participated in the Connect America Fund Phase II auction, where it secured funding to connect more than 11,000 unserved locations.

To meet its business objectives, GeoLinks intends to experiment with upgraded access point and customer premise equipment ("CPE"). GeoLinks has already started working with a new equipment and software manufacturer, Globtel, to design new equipment for use with its current network. GeoLinks plans to work with Globtel to conduct a proof of concept test for this new equipment. As part of the testing, GeoLinks expects to gain a better "real world" understanding of the benefits, challenges and costs associated with deployment of the new equipment. Should the test prove successful GeoLinks plans to purchase the equipment designed for use in other bands and specifically tailored for GeoLinks' networks. GeoLinks will also use this trial for Globtel to teach GeoLinks' field technicians how to install, manage, and repair this new equipment.

The STA will further inform GeoLinks' business, investment, technology and deployment decisions as it plans for expansion of its broadband networks into unserved and underserved areas. As an example, the trial will help GeoLinks determine how to design equipment it can deploy to create network architecture that efficiently and reliably provides internet in areas that traditionally have not had broadband internet service. The experiment will also provide an opportunity for the equipment manufacturer to teach GeoLinks' service personnel how to manage and repair the equipment so it can best serve its customers.

Description of Program

GeoLinks is seeking to use the 10-12 GHz band to test new fixed wireless equipment. The test equipment will operate at a mean ERP of 15 dBm/8MHz with a beam width of 45 degrees at half-power, oriented 90 degrees from True North and 11 degrees from the horizontal. The emissions designator for the test is 6M25G7D and the following modulation schemes:

- 64QAM
- 256QAM
- 512QAM
- 1024QAM
- 4096QAM

GeoLinks has identified the Simi Valley area as the optimum place to conduct the limited market trial experiment. GeoLinks currently operates in the area so it can rely on in-market personnel to monitor the test and ensure that there will be no harmful interference to any incumbent users and to promptly remedy harmful interference in the unlikely event it occurs. Furthermore, these locations were selected because it appears there are no other users actively operating in this area. The trial will take place in three specific locations:

- Start point: Simi – 34°14'40.50"N, 118°40'26.00"W - Quarter mile North West of Black Canyon Road and N American cutoff intersection, Simi Valley, CA.
- End Point 1: Vons – 34°16'20.65"N, 118°40'39.24"W - 375 feet North East of the E Los Angeles Avenue and Yosemite Avenue intersection, Simi Valley, CA.
- End Point 2: Kuehner – 34°16'56.03"N, 118°39'38.19"W - North end of Kuehner Road, Simi Valley, CA.

Pursuant to this STA, GeoLinks plans to test six (6) total pieces of equipment manufactured by Globtel. The equipment used in the trial consists of the following:

- 1 piece, Globtel BTS Model, Model No. BS-E-90-001 (base station)
- 5 pieces, Globtel CPE Model, Model No. TVIP-003 (CPE)

The test equipment will utilize a temporary, non-permanent mounts like a tripod or flat mount.

Objectives of Experimental Program

GeoLinks desires to test new equipment and software from a new manufacturer as proof of concept. Should the test prove successful, GeoLinks intends to purchase custom-designed equipment from this manufacturer for operation in other spectrum bands.