

CellTex Networks, LLC dba ZipLink
Statement in Support of Renewal of Experimental License
Call Sign WI2XYI

CellTex Networks, LLC dba ZipLink (“ZipLink”) provides this statement in support of its application for renewal of its experimental license (Call Sign WI2XYI). ZipLink requests a license term of six months to conclude its trial.

Overview

ZipLink is a fixed wireless broadband provider that holds a nationwide non-exclusive 3650-3700 MHz service license (Call Sign WQLL980). In addition to using this license to provide last-mile fixed broadband service to customers, ZipLink also uses unlicensed spectrum in the 5 GHz band. ZipLink currently provides broadband service to approximately 2,750 residential and business subscribers in rural areas southeast of San Antonio, Texas.

ZipLink has deployed in the 3650-3700 MHz band. The LTE equipment uses software-defined radios that can be turned to operate in the 3550-3650 MHz band and, ultimately, configured to operate with the SAS and ESC that are under development. Based on its experience, ZipLink believes that LTE technology deployed in the 3550-3700 MHz band offers the best combination of throughput, propagation, cost and equipment to deliver high-quality broadband service to its subscribers and others in the target markets that lack access to competitive broadband services.

In its trial, ZipLink is testing LTE equipment manufactured by Telrad. In the next phase of the trial, ZipLink will continue this trial, but may consider experimenting with different equipment to see if it performs better and/or can be deployed more cost-effectively should ZipLink determine that it desires to use the Citizens Broadband Radio Service (“CBRS”) when it becomes commercially available. By comparing performance results and price points, ZipLink can gain a greater understanding of the benefits, challenges and costs associated with near-term deployment of LTE equipment in the CBRS band. ZipLink also plans to experiment with various speed (up to 50 Mbps download packages) and pricing plans to assess consumer acceptance of the service. If ZipLink changes any of the technical parameters of the trial, it will seek further Commission authority.

Renewal of the experimental license also will provide ZipLink with more information to help make its future expansion and network investment plans. Assuming the trial is successful, ZipLink expects to utilize a combination of Priority Access Licenses (“PAL”) and GAA “license by rule” spectrum across the entire 150 megahertz of 3550-3700 MHz spectrum. ZipLink does not propose to make any modifications to the technical parameters authorized under the existing experimental license.

Description and Objectives of Trial Program

Because the Commission has not yet certified equipment for use with the SAS or the ESC in the CBRS band, ZipLink plans to continue to use LTE equipment certified by the FCC for use in the 3650-3700 MHz band that is re-tuned to the 3550-3650 MHz band. 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.²

ZipLink will continue to conduct the experiment in its existing network area. ZipLink has access to and is transmitting on other frequencies from existing towers and operation in this area with personnel on site to monitor construction and operation, to 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 also show that there are no Fixed Satellite earth stations in the 3600-3650 MHz band operating anywhere near the test area.

As described above, under the market trial aspect of the experiment, ZipLink plans to test different equipment, broadband speeds and price points to determine the utility and value of the CBRS as it relates to consumer take rates and network performance. Consistent with the market trial requirements of Section 5.602(d), ZipLink will own the access point and customer premise equipment, and will not transfer ownership to trial participants.

As required by Section 5.602(e), all end users will be advised at the commencement of the trial that service is being provided on a trial basis, that any non-approved devices are for testing only and that all equipment must be returned at the end of the trial period. ZipLink further acknowledges that it will retrieve the end user devices from the users at the end of the trial. In particular, all end users will be notified that the service they will be receiving is being provided in part or in whole under experimental authority, and that as a condition of the experimental license, ZipLink may be required at any time, without prior notice, to cease operations in the 3550-3650 MHz band. In addition, ZipLink acknowledges and will notify users that all customer premise equipment authorized under the experimental license remains the property of ZipLink, and must be collected or rendered inoperable at the conclusion of the trial. At the end of the trial, ZipLink will either: (1) shut off the service immediately, stop billing users for the service and post a public notice at ziplinkinternet.com, and collect or render all customer premise equipment inoperable, or (2) change the frequency and operating parameters of some or all of the customer premise equipment that is part of the trial to parameters authorized under Part 90, Subpart Z of the FCC rules (which may materially impact network capacity, performance, and quality of service), post a public notice to ziplinkinternet.com, and allow users to opt out of the modified service offering with no further obligation to pay for the service.