

From: Stephen Coran

To: Doug Young

Date: November 09, 2017

Subject: Request for Info - File # 0552-EX-CN-2017

Message:

Softcom Internet Communications, Inc.
File No. 0552-EX-CN-2017
Correspondence Reference No. 39584

The information below responds to the Commission's November 6, 2017 email request for information. To what extent does the planned market trial transcend the existing network? What is the justification for a market trial that appears to be in similar communities?

Response: It is important for Softcom Internet Communications, Inc. (Softcom) to trial spectrum equipment and technology across its network in order to compare, on a site-by-site basis, performance of 3550-3650 MHz to other unlicensed and lightly-licensed spectrum that Softcom currently uses. In some locations, population density, terrain and foliage may dictate use of one technology or spectrum band, whereas differing local circumstances in other areas may dictate a different solution. Also, Softcom's access points are in different census tracts, and therefore will inform Softcom's decision whether to acquire Priority Access Licenses (PALs). In addition, as a strategic partner of Telrad Networks in North America, Softcom has given Telrad unprecedented levels of access to Softcom's network. The real-world information that Telrad will gather will be very valuable in informing Telrad's future design decisions, whether they be minor adjustments to current equipment or new products altogether.

Given that to test upgradability of equipment, you need to do this only per equipment type and to do a market trial, you only need to sample a portion of the market, explain the size of the requested market trial.

Response: Each access point has its own demography and topography such that analysis of the utility of 3550-3650 MHz spectrum may vary widely. In addition, access points may have differing numbers of end users, which affects speed and congestion. Softcom may decide that in certain locations 3550-3650 MHz is not a viable solution or that the cost of PALs will exceed the benefit. There are also differing technologies that Telrad is developing that need to be tested in real-world deployments, such as varying channel widths, different sub-frame and special sub-frame configurations, carrier aggregation and multi-user MIMO, among others. The availability to test different configurations in different parts of the network at the same time will provide valuable feedback to both Softcom and Telrad, and will advance the radio art.

If a market trial is granted, it is not likely that we would extend the trial beyond the initial term requested.

Response: Softcom understands and completely agrees that the trial would be limited to two years, and is confident that this will be a sufficient period of time for Softcom to achieve its objectives.