

From: Stephen Coran

To: Doug Young

Date: November 14, 2017

Subject: Request for Info - File # 0553-EX-CN-2017

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Message:

White Cloud Communications, Inc.

File No. 0553-EX-CN-2017

Correspondence Reference No. 39586

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 White Cloud Communications, Inc. (White Cloud) 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 White Cloud currently uses. In some locations, population density, terrain (including desert canyons to heavily forested mountains) and foliage may dictate use of one technology or spectrum band, whereas differing local circumstances in other areas may suggest a different solution. Also, White Cloud's planned access points are in different census tracts, and therefore will inform White Cloud's decision whether to acquire Priority Access Licenses (PALs). In White Cloud's experience, LTE-based technologies may face difficulties in communicating with other network elements in order to ensure reliable long-range connectivity.

White Cloud has considered acquiring 2.5 GHz spectrum rights where available in portions of its network. The availability of Citizens Broadband Radio Service spectrum, both on a Priority and General Authorized Access basis, offers White Cloud the ability to compare propagation, throughput and costs so it can better determine the best spectrum solution to fit its needs across its diverse network.

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. White Cloud may decide that in certain locations 3550-3650 MHz is not a viable solution, or the best solution, or that the cost of PALs will exceed the benefit relative to other spectrum bands that may be available to White Cloud. The availability to test different configurations in different parts of the network at the same time will provide valuable feedback to both White Cloud 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: White Cloud understands and agrees that the trial would be limited to two years. It believes that this will be a sufficient period of time for White Cloud to achieve its objectives.