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Feedback re: Consultation on the Technical and Policy Framework for the 3650-4200 MHz Band and Changes to the Frequency Allocation of the 3500-3650 MHz Band

Dear IC,

SpeedFI Inc is a high-speed internet service provider in rural Ontario. We use the WBS band to deliver reliable LTE high-speed internet to the countryside. We use this technology because there is no other band that we have access to can penetrate trees like LTE and get the speed our customer need for day to day work. Like working from home and streaming unlimited video at prime time with no buffering. We can reuse the band because we use LTE technology with standers for GPS re-sync. We tried to add 5GHz to our network to add capacities for covid and it had large issues with tree penetration. Only 10% of our customers could be moved to the 5ghz we deployed to help offload the LTE network to add extra capacity for covid. We are now considered an Urban area and can't deploy any new LTE towers. We have 3 towers sitting in a box at the office collecting dust and making us look bad with a broken promise to people. The area that is considered urban is so remote you need to take a ferry to get there. If the ferry breaks down the whole island are isolated from the city. The other towers that were going to be deployed are all on islands with only ferry access to get there. With the speed that currently will not support working from home. We use LTE so if you move our band higher and outside of 3GPP bands the equipment will be useless. If there no direct LTE band replacement it would force us to turn off most of our customers left with no internet. For example band 48 can do 3550 – 3700 band 42 3400 – 3600, band 43 3600 – 3800 if its outside of these bands the LTE equipment will no longer work. We can't afford to lose this band or will need to relocate within Band 42, 43, 48 for LTE. To deliver 50/10 Mbps, we will need more spectrum like 100mhz coupled with LTE aggregation to provide those speeds and be the most spectrum efficient with GPS sync and band reuse. We need it at a price that smaller WISP can afford because of the large cost of using LTE to deliver the last mile that was never able to be delivered with speed before. We are happy to keep spending money on equipment to get to the goal of 50/10 Mbps unlimited bandwidth we just need your help getting that extra spectrum. So we can close the gap on the digital divide in the countryside.

Sincerely,

Dalton Gilmore
Chief Operating Officer