



PUBLIC NOTICE

Federal Communications Commission
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DA 24-468

Released: May 17, 2024

WIRELESS TELECOMMUNICATIONS BUREAU SEEKS COMMENT ON GEOLINKS' REQUEST FOR MODIFICATION OF LOCAL MULTIPOINT DISTRIBUTION SERVICE LICENSES

WT Docket No. 24-150

Comments Due: June 17, 2024

Reply Comments Due: July 2, 2024

By this Public Notice, we seek comment on a request by California Internet, L.P. DBA GeoLinks (GeoLinks) that the Commission modify some of GeoLinks' Local Multipoint Distribution Service (LMDS) licenses to substitute unassigned frequencies currently held in Commission inventory for GeoLinks' existing geographically and spectrally separated license holdings.¹

There are two available LMDS licenses in each basic trading area (BTA) - the "A Block" and "B Block" licenses.² The A Block license is comprised of 300 megahertz of total bandwidth, and the B Block license is comprised of 150 megahertz of total bandwidth.³ The A Block consists of the sub bands 29.10-29.25 GHz (the A2 Band) and 31.075-31.225 GHz (the A3 Band).⁴ The B Block consists of the sub bands 31.00-31.075 (the B1 Band) and 31.225-31.30 GHz (the B2 Band).⁵

GeoLinks is a telecommunications company that uses a combination of fixed wireless and fiber technology to serve commercial, residential, and community anchor institution customers in California and in parts of Nevada and Arizona.⁶ GeoLinks is a participant in the Commission's Connect America Fund Phase II (CAFII) and Rural Digital Opportunity Fund (RDOF) programs. With funding from these programs, GeoLinks asserts that it is "on track to offer service to nearly 47,000 locations across Arizona, California, and Nevada that lack access to high-speed broadband services."⁷

The *GeoLinks Request* involves 51 active LMDS licenses held by GeoLinks - nine A block licenses and 42 B block licenses. Under GeoLinks' proposal, 32 of those licenses would be modified, and

¹ See California Internet, L.P. DBA Geolinks, Request for Modification, WT Docket No. 24-150 (filed Mar. 18, 2024) (*GeoLinks Request*).

² See 47 CFR § 101.1005.

³ *Id.*

⁴ See 47 CFR § 101.1005. The 27.5-28.35 GHz band was originally part of LMDS (as the A1 Band) but was converted to the Upper Microwave Flexible Use Service in 2016. See 47 CFR § 30.102.

⁵ See 47 CFR § 101.1005.

⁶ *GeoLinks Request* at 4.

⁷ *Id.* at 5.

the other 19 licenses would be relinquished to the Commission.⁸ Of the 32 modification requests, 30 involve changes in the licenses' geographic areas by changing the BTA in which each license authorizes operations. The remaining two modification requests seek changes to both the BTA and frequency assignment within the LMDS band (from the B-Block to the A-Block).⁹ GeoLinks asserts that its proposed modifications would result in the company surrendering more licenses, more markets, and more MHz-pops than it would receive, but consolidating A and B license blocks and gaining contiguous spectrum that would allegedly result in more efficient and economic deployment targeted to rural and underserved areas in its core service areas.¹⁰

Exhibit 1 of the *GeoLinks Request* provides details on the BTA (and where applicable, spectrum block) for the requested modification of each GeoLinks license. Exhibit 2 provides the list of licenses that GeoLinks intends to relinquish if the Commission grants the full set of modifications as requested. The exhibits detail GeoLinks' estimates of the MHz-pops for each license swap as well as the overall MHz-pops the Commission would gain as a result of the proposed modifications and relinquishment.¹¹

The Bureau seeks comment on the *GeoLinks Request*. Interested parties may file comments on or before the date indicated on the first page of this document.

Procedural Matters

To develop a complete record on the issues presented by the Requests, the proceeding will be treated, for *ex parte* purposes, as a "permit-but-disclose" proceeding in accordance with section 1.1200(a) of the Commission's rules,¹² subject to the requirements under section 1.1206(b).¹³ GeoLinks filed its Request electronically in the Commission's Electronic Comment Filing System (ECFS). We have opened a new docket, **WT Docket No. 24-150**, to facilitate consideration of the Request and have moved GeoLinks' Request into this docket. Parties should file all comments and reply comments in **WT Docket No. 24-150**.

Filing Requirements. Pursuant to sections 1.415 and 1.419 of the Commission's rules, 47 CFR §§ 1.415, 1.419, interested parties may file comments and reply comments on or before the dates indicated on the first page of this document.¹⁴ Parties may file comments, identified by **WT Docket No. 24-150**, by any of the following methods:

- Electronic Filers: Comments may be filed electronically using the Internet by accessing ECFS: <https://www.fcc.gov/ecfs/>.
- Paper Filers: Parties who choose to file by paper must file an original and one copy of each filing.

⁸ *Id.* at 7.

⁹ *Id.* at 7.

¹⁰ *Id.* at 2.

¹¹ *Id.* at 7, Exhibits 1 and 2.

¹² 47 CFR § 1.1200(a).

¹³ 47 CFR § 1.1206(b).

¹⁴ See Federal Communications Commission, *Electronic Filing of Documents in Rulemaking Proceedings*, 63 Fed. Reg. 24121 (June 30, 1998).

- Filings can be sent by commercial overnight courier, or by first-class or overnight U.S. Postal Service mail. All filings must be addressed to the Commission’s Secretary, Office of the Secretary, Federal Communications Commission.
 - Commercial overnight mail (other than U.S. Postal Service Express Mail and Priority Mail) must be sent to 9050 Junction Drive, Annapolis Junction, MD 20701.
 - U.S. Postal Service First-Class, Express, and Priority Mail must be addressed to 45 L Street NE, Washington, D.C. 20554.
- Effective March 19, 2020, and until further notice, the Commission no longer accepts any hand or messenger delivered filings. This is a temporary measure taken to help protect the health and safety of individuals, and to mitigate the transmission of COVID-19.¹⁵

People with Disabilities. To request materials in accessible formats for people with disabilities (braille, large print, electronic files, audio format), send an e-mail to fcc504@fcc.gov or call the Consumer & Government Affairs Bureau at 202-418-0530 (voice), 202-418-0432 (tty).

Ex Parte Rules. As stated above, the proceeding this Notice initiates shall be treated as a “permit-but-disclose” proceeding in accordance with the Commission’s *ex parte* rules.¹⁶ Persons making *ex parte* presentations must file a copy of any written presentation or a memorandum summarizing any oral presentation within two business days after the presentation (unless a different deadline applicable to the Sunshine period applies). Persons making oral *ex parte* presentations are reminded that memoranda summarizing the presentation must (1) list all persons attending or otherwise participating in the meeting at which the *ex parte* presentation was made, and (2) summarize all data presented and arguments made during the presentation. If the presentation consisted in whole or in part of the presentation of data or arguments already reflected in the presenter’s written comments, memoranda or other filings in the proceeding, the presenter may provide citations to such data or arguments in his or her prior comments, memoranda, or other filings (specifying the relevant page and/or paragraph numbers where such data or arguments can be found) in lieu of summarizing them in the memorandum. Documents shown or given to Commission staff during *ex parte* meetings are deemed to be written *ex parte* presentations and must be filed consistent with rule 1.1206(b). In proceedings governed by rule 1.49(f) or for which the Commission has made available a method of electronic filing, written *ex parte* presentations and memoranda summarizing oral *ex parte* presentations, and all attachments thereto, must be filed through the electronic comment filing system available for that proceeding, and must be filed in their native format (e.g., .doc, .xml, .ppt, searchable .pdf). Participants in this proceeding should familiarize themselves with the Commission’s *ex parte* rules.

Additional Information. For further information regarding this Public Notice, please contact Erin Fitzgerald Dobozy at Erin.Fitzgerald@fcc.gov.

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¹⁵ See *FCC Announces Closure of FCC Headquarters Open Window and Change in Hand-Delivery Policy*, Public Notice, DA 20-304 (Mar. 19, 2020), <https://www.fcc.gov/document/fcc-closes-headquarters-open-window-and-changes-hand-delivery-policy>.

¹⁶ 47 CFR §§ 1.1200 *et seq.*