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General Comment

In regard to Question 22 (<https://www.federalregister.gov/d/2022-26938/p-73>) We encourage NTIA to ensure that a diverse group of stakeholders can compete for funding to further develop 5G and successor open and interoperable, standards-based RAN. We support a funding category for small companies or projects where one party is a small company. Valuable work is being done by these organizations but Innovation Fund support is vital to continued development, particularly for companies still in the start-up phase.

Our company, Barger Creek Wireless (BCW), offers affordable and reliable broadband in Montmorency County in rural Michigan. Even with significant fiber build outs there will be gaps in connectivity where fixed wireless will be the right solution. We are encouraged by the efforts of WiFrost, a small company with a TVWS product that provides up to 100 mbps downlink speeds using 4G in the TVWS band. The ability to deliver this kind of speed through a heavily treed environment is exceedingly valuable for our underserved area.

Once WiFrost delivers a 5G fixed wireless solution using Open RAN, it will enable BCW to provide 400 Mbps downlink and 100 Mbps uplink service to our customers in very hard to reach areas using TVWS spectrum, as well as CBRS spectrum. These speeds provided at an affordable price point to BCW's customers are essential to help with the digital divide. With customers in areas where physical distance between customers or customers and fiber is large, BCW and other WISPs can use technology like WiFrost's to make offering extremely high speeds like this economically possible and sustainable. We strongly encourage NTIA to create a specific category in the Innovation Fund to support development and deployment efforts like WiFrost.