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General Comment

CTC offers fiber and fixed wireless access solutions to over 7,000 subscribers in Idaho and Oregon. Even with significant fiber build outs there are gaps in connectivity, where fixed wireless is often the right solution. WiFrost's current TVWS product provides up to 100 mbps downlink speeds using 4G in the TVWS band. With a 5G fixed wireless solution using Open RAN, CTC could potentially provide 400 Mbps downlink and 100 Mbps uplink service to our customers in very hard to reach areas using underutilized TVWS spectrum.

We strongly encourage NTIA to create a specific category in the Innovation Fund to support development and deployment efforts like WiFrost. CTC will be an ideal network for an Open RAN proof-of-concept and a great case study on commercializing 5G Open RAN technology. ISPs using multiple technologies including fiber and multi frequency, multi standard wireless solutions like CTC are essential to providing affordable and reliable internet in the unconnected parts of the United States.