

November 14, 2014

**VIA ELECTRONIC FILING**

Ms. Marlene H. Dortch Secretary  
Federal Communications Commission  
445 Twelfth Street, SW  
Washington, DC 20554

Re: ***Protecting and Promoting the Open Internet, GN Docket No. 14-28;  
Framework for Broadband Internet Service, GN Docket No. 10-127***

Dear Ms. Dortch:

The undersigned regional mobile broadband providers proudly serve many of America's less populated and/or harder to reach markets, where the cost of providing service is significantly higher than it is in more metropolitan or suburban areas. We nonetheless are committed to providing our customers with all that the Digital Age can offer, including an Open Internet. To protect our ability to offer high-quality mobile broadband services, the Commission should reject calls for prescriptive new rules that would harm smaller, regional providers.

As the Commission has recognized, mobile broadband providers face technical and operational challenges far more complex than our fixed counterparts do – especially regional operators, who often rely on smaller spectrum holdings that make flexibility in network management all the more important. All wireless carriers operate in a dynamic environment with varying user demand and fluctuating interference conditions, and we need the flexibility to aggressively manage traffic to provide consumers the mobile broadband experience they expect. Rigid new rules grounded in a “fixed world” perspective would upend and disrupt this mobile broadband experience and harm those carriers providing broadband access to the most rural and remote communities across the nation.

As regional providers, it is critical that we have the ability to differentiate our services as we seek to compete against larger national mobile broadband providers. Our relationships with our customers are vital to our success, so we are strongly incented to seek out new and innovative pro-consumer offerings, and to examine alternative ways to deliver services that will be valuable to our consumers. It is important that we retain the flexibility to distinguish ourselves that the Commission granted in the 2010 Open Internet rules, and that any new rules be based on a mobile-specific approach. Given our unique challenges, applying sweeping rules, even subject to a network management exception, would not afford us the flexibility to innovate, experiment, and deliver differentiated services to our communities.

Applying an outdated and backward-looking Title II common-carriage regime to our services would also stifle innovation and investment and would do a disservice to rural America. Similarly, Commission adoption of expansive no-blocking rules or “commercially reasonable” standards for mobile broadband would hinder smaller carriers' ability to engage in practices

designed to improve network performance or offer the alternative business models at the heart of competitive differentiation. Rules imposing granular transparency requirements would divert limited small-carrier resources and raise our costs, would be impractical, and even worse, would limit our flexibility in delivering high-quality services. The Commission should steer a wiser course and only consider a regulatory approach that accounts for the unique nature of mobility and encourages ongoing broadband investment, deployment, and skyrocketing use.

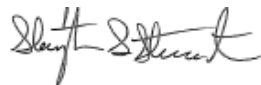
Make no mistake; we support Internet openness. Our businesses depend on our subscribers' ability to access the applications, services, and content of their choice, so we have every incentive to keep our consumers happy by offering them the products and services they desire. We live in the communities we serve, and providing our neighbors' world class service is important to us. Indeed, the record contains no evidence that we are infringing on Internet openness. We are committed to working closely with the Commission to preserve the Open Internet.

In recent years, the Commission has pursued policies that foster opportunities for smaller providers in the wireless market in decisions ranging from auction policy to 700 MHz interoperability. In this proceeding, the Commission should continue on this path by rejecting a strict uniform, fixed-mobile, one-size-fits-all, model of outdated regulation that will only disrupt our services and the American mobile broadband experience.

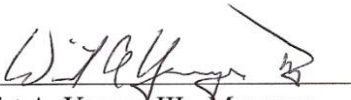
Sincerely,



Ron Smith  
President and CEO, Bluegrass Cellular, Inc.



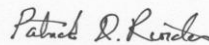
Stewart Slayton  
CEO, Carolina West Wireless



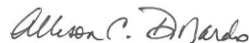
Wirt A. Yerger, III - Manager  
Cavalier Wireless, LLC



Cavalier Wireless™



Patrick Riordan  
President and CEO, Cellcom



Allison C. DiNardo  
President, King Street Wireless, Inc

