



WISCONSIN MANUFACTURERS & COMMERCE

ET Docket No. 14-165

March 8, 2017

Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

DOCKET FILE COPY ORIGINAL

Received & Inspected

MAR 14 2018

FCC Mailroom

To the Federal Communications Commission:

I'm writing on behalf of Wisconsin Manufacturers & Commerce to urge you to adopt the regulations needed to make TV White Space technology a reality in the market for broadband access. TV white space offers the most affordable option for broadband delivery in sparsely populated areas, which are often underserved when it comes to Internet access.

WMC is the largest general business association in Wisconsin. Founded in 1911, we have nearly 3,800 member companies doing business in every sector of the economy. Our members are small, medium and large businesses located throughout all corners of the state. Access to high-speed internet is a critically important competitiveness issue for businesses in our state.

Lack of access to broadband Internet means fewer educational and job opportunities as well as poor health outcomes. If we are unable to bridge the gap with affordable access to broadband Internet, this problem will only get worse as our population continues to age and our young people leave the region to pursue job opportunities elsewhere.

TV White Space technology can help us bridge this gap by delivering high speed Internet that operates four times faster and reaches 16 times farther than Wi-Fi. And this technology operates at a frequency that can move through objects like hills and foliage. It's estimated that broadband Internet served on the White Space spectrum could reach significant majority of the rural population that lacks high-speed Internet access today.

To provide affordable and reliable service in rural communities, we must deploy a combination of "wired" and "wireless" technologies, including fiber-based, satellite and wireless technologies, leveraging a range of frequencies including TV white spaces. To make this plan a reality, CAN is urging the FCC to ensure that three channels below 700 MHz are available for wireless use on an unlicensed basis in every market in the country, with additional TV white spaces in smaller markets and rural areas."

The FCC helped advance White Space technology by previous orders over the last decade that set the stage for its introduction and development. In order to take advantage of TV White Spaces, the FCC needs to ensure the continued use of at least three channels below 700 MHz on an unlicensed basis in every market in the country.

Now that the technology has been successfully piloted in numerous projects in the U.S. and abroad, I'm urging you to finalize the permanent policies necessary to ensure that White Space can be used at a commercial scale.

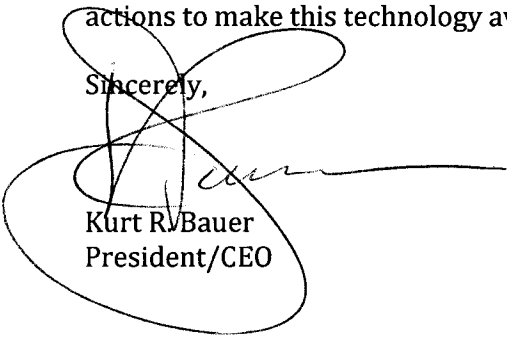
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Founded in 1911, WMC is Wisconsin's chamber of commerce and largest business trade association.

Lack of Internet access has been an impediment to region. Please take the appropriate actions to make this technology available to those who need it most.

Sincerely,



Kurt R. Bauer
President/CEO

CC: Speaker Paul Ryan
U.S. Senator Ron Johnson
U.S. Senator Tammy Baldwin
U.S. Representative Sean Duffy