

**Before the
Federal Communications Commission
Washington, DC 20554**

In the Matter of)	
)	
RADWIN LTD.)	RM-11812
)	
Amendment of Part 15 of the Commission's Rules)	
To Advance Improved Broadband Services)	
In the U-NII-1 and U-NII-3 Bands)	

To: The Commission

**COMMENTS OF
THE WIRELESS INTERNET SERVICE PROVIDERS ASSOCIATION**

The Wireless Internet Service Providers Association (“WISPA”), pursuant to Sections 1.4 and 1.405 of the Commission’s Rules, hereby comments in support of the Petition for Rulemaking (“Petition”) filed on June 18, 2018 by RADWIN LTD. (“RADWIN”).¹ The Petition proposes changes to Section 15.407(a)(1)(iii) and (a)(3) that would, if adopted, enable better performing and lower cost fixed wireless operations in 5 GHz U-NII bands for improved broadband service, especially in rural areas. The Petition therefore demonstrates “sufficient reasons,” consistent with the Commission’s rules, for the Commission to adopt a notice of proposed rulemaking.²

Introduction

WISPA represents the interests of wireless Internet service providers (“WISPs”) that provide high-speed fixed wireless broadband services to consumers, businesses, first responders, and community anchor institutions across the country. WISPA’s members include more than 800 WISPs, equipment manufacturers, distributors and other entities committed to providing affordable and competitive fixed broadband services. WISPs use unlicensed spectrum, lightly-

¹ See Public Notice, Report No. 3097 (rel. June 29, 2018).

² 47 C.F.R. § 1.407.

licensed spectrum (or “shared access” spectrum) and licensed spectrum to deliver last-mile broadband and voice services to more than four million consumers in rural and other unserved and underserved areas where other providers decline to invest. In particular, the 5 GHz U-NII band is “workhorse” spectrum that a large number of WISPs use as the primary spectrum band for delivery of fixed broadband services. Typical download speeds are in the range of 5 to 50 Mbps, a number that will increase as technology improves and equipment costs become more competitive.³

Discussion

In its Petition, RADWIN proposes changes to Section 15.407 to allow sequential multiple directional beam technology to operate at power levels that are authorized for point-to-point operations in the U-NII-1 and U-NII-3 bands.⁴ As RADWIN points out, modifying the rules in this manner would harmonize the 5 GHz band rules with rules applicable to the 2.4 GHz unlicensed band.⁵

RADWIN recites significant public interest benefits that would stem from the rule changes it proposes. Of particular importance to WISPA and the customers its members serve, WISPs will have the ability to offer higher throughput and better performance in terms of gain, capacity, range and robustness with no additional increase in cost. With improved performance at the same cost, broadband can be deployed more economically, which will make the business case for serving rural Americans all the more compelling. It may specifically simplify

³ See The Carmel Group, *Ready for Takeoff: Broadband Wireless Access Providers Prepare to Soar with Fixed Wireless*, the BWA Industry Report (2017) (“Carmel Group Report”), available at http://www.wispa.org/Portals/37/Docs/Press%20Releases/2017/TCG's_2017_BWA_FINAL_REPORT.pdf (last visited July 5, 2018), at 5.

⁴ See Petition at 2.

⁵ See *id.*

deployments in sensitive, higher hub locations, as it will allow one beam-forming backhaul antenna to be used in place of several separate point-to-point antennas.

RADWIN also demonstrates that its beamforming technology will not result in interference greater than the interference that would be generated by point-to-point devices operating with directional antennas or point-to-multipoint devices using legacy sectorized wide-beam antennas.⁶ Based on its review of RADWIN's technical report, WISPA believes this to be true.

In sum, WISPA believes that the rule changes proposed by RADWIN can offer significant improvements in fixed broadband deployment without increasing costs. The Commission therefore should adopt a notice of proposed rulemaking inviting comment on the Petition and the rules proposed therein.

Respectfully submitted,

**WIRELESS INTERNET SERVICE
PROVIDERS ASSOCIATION**

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July 30, 2018

⁶ See *id.* at 7.

CERTIFICATE OF SERVICE

I, Sharon Krantzman, hereby certify that on this 30th day of July, 2018, a copy of the foregoing “Comments” was sent by first class, postage prepaid mail to the following:

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