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February 26, 2016

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

Re: *ORAL EX PARTE PRESENTATION - WT Docket No. 03-66 and IB
Docket No. 13-213*

Dear Ms. Dortch:

I am writing pursuant to Section 1.1206(b)(2) of the Commission's Rules to notify the Commission that on February 24, 2016, the undersigned Paul J. Sinderbrand and Mary N. O'Connor, counsel for the Wireless Communications Association International ("WCA"), together with WCA members John Ogren and Phil Merrill of SpeedConnect LLC, Paul Emmons of Beamspeed LLC, Jim Goldstein of Sprint Corporation, Jennifer McCarthy of Nextwave HoldCo LLC, Jim McKenna of Redzone Wireless, LLC, Nathan Stooke of Wisper ISP, Inc., and Jeff Kohler of Rise Broadband, met with Edward "Smitty" Smith, Legal Advisor to Chairman Tom Wheeler. During the course of the meeting, we discussed the June 20, 2013 joint compromise proposal of WCA, the National EBS Association, the Catholic Television Network, and other Educational Broadband Service ("EBS") licensees in WT Docket No. 03-66 for the licensing of currently unlicensed EBS spectrum, and the concerns of the Broadband Radio Service ("BRS") community regarding interference from Globalstar's proposal to deploy a Terrestrial Low Power Service ("TLPS") in the spectrum immediately adjacent to the BRS allocation.

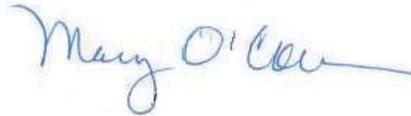
The parties urged the Commission to move as quickly as possible in WT Docket No. 03-66 to adopt a notice of proposed rulemaking addressing the licensing of unlicensed EBS spectrum – spectrum that has been unavailable for more than twenty years. The operators discussed the success they have had in providing broadband services in areas that are licensed to EBS licensees. However, the operators also presented examples of areas that are adjacent to their successful operating areas not covered by EBS licenses, that cannot be provided with the robust broadband services that they are providing in areas where the EBS spectrum is fully licensed. Attached hereto are maps that reflect a few of those underserved areas in the EBS white space.

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WCA also reiterated the concerns it has previously advanced in IB Docket No. 13-213 regarding the potential for interference from Globalstar's proposed TLPS to licensed BRS/EBS operations in adjacent spectrum.

Pursuant to Sections 1.1206(b)(2) and 1.49(f) of the Commission's Rules, this letter is being filed electronically with the Commission via the Electronic Comment Filing System. Should you have any questions regarding this presentation, please contact the undersigned.

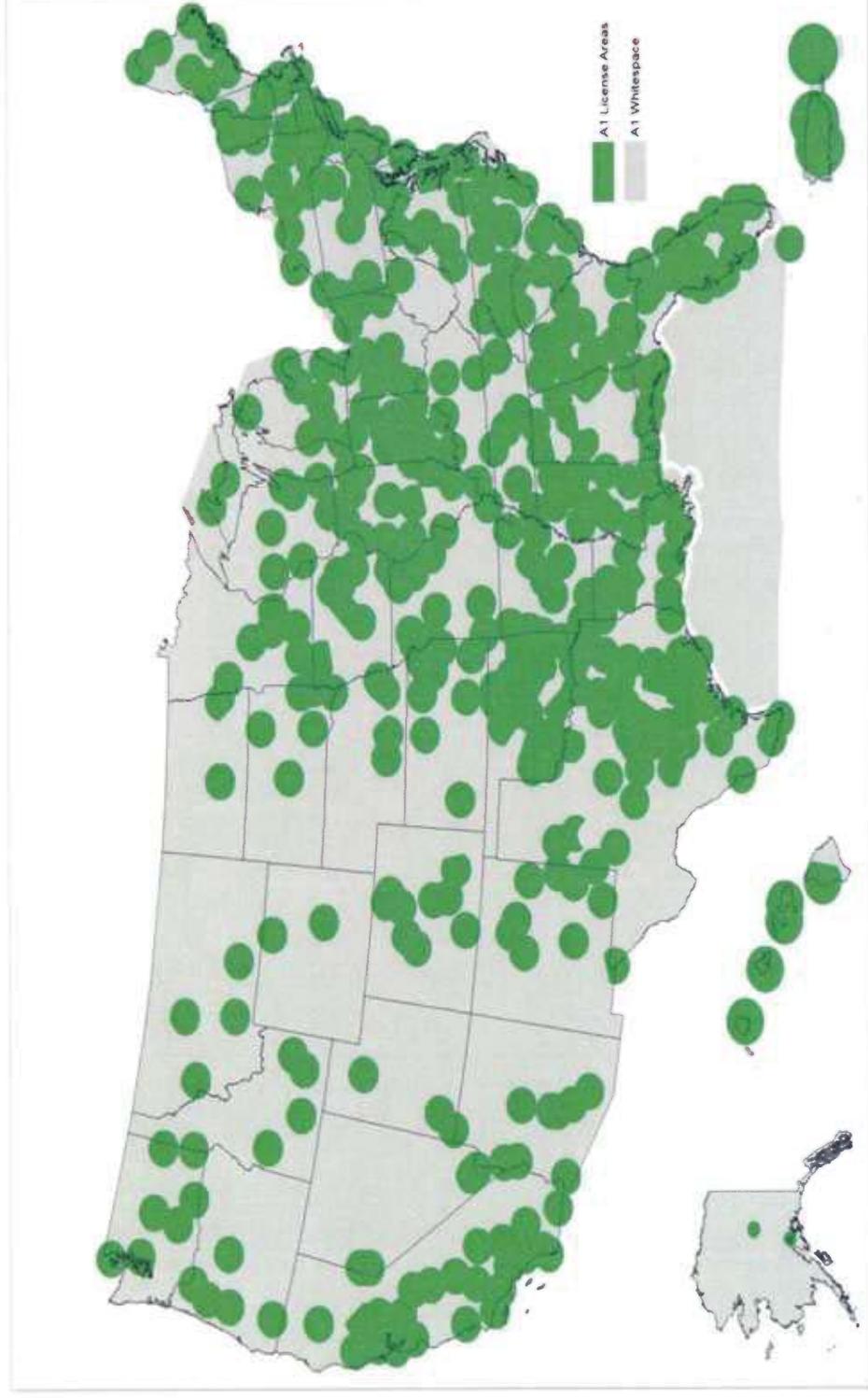
Respectfully submitted,



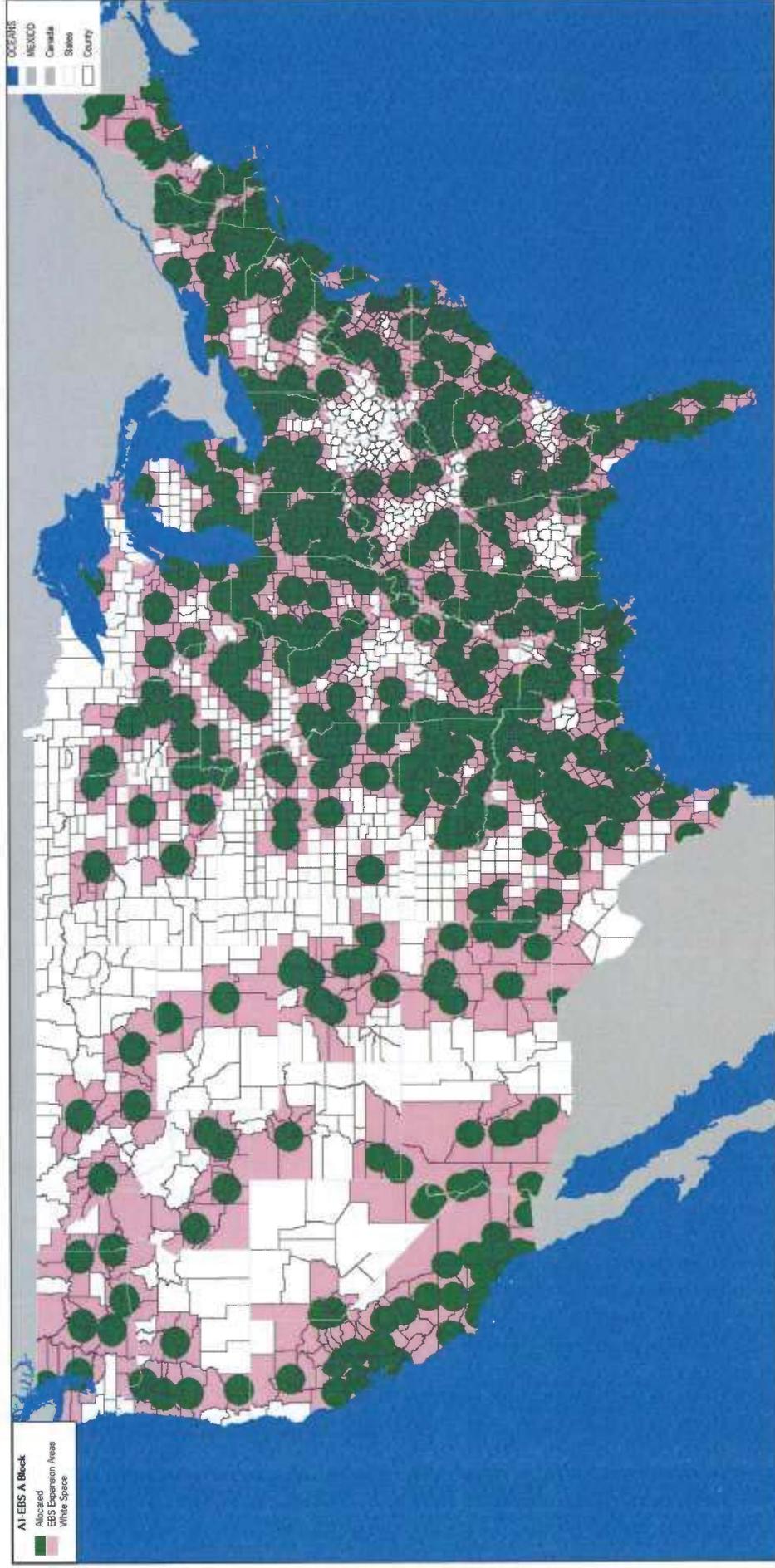
Paul J. Sinderbrand
Mary N. O'Connor
Counsel to the Wireless Communications
Association International

Attachments

EBS White Space Nationwide on Channel A1



White Space on Channel A1 after GSA Expansion



WISPER ISP

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nstooke@wisperisp.com



THE WISPER STORY

Wisper was created in 2003 when Nathan Stooke decided to make a change from owner of a software company to entrepreneur in the wireless Internet field. Stooke's neighbor, a local business owner, could not find a high speed Internet option at his office only two miles down the road, despite being able to get both cable and DSL at their home. More than six months of research on "How Wireless Internet Works" and three maxed credit cards later, Wisper ISP was born. Wisper was built from the ground up, focusing on underserved rural areas. News of the new high-speed Internet option spread like wildfire in the broadband-starved community, as grateful new customers eagerly told all of their friends and neighbors.

As customer referrals increased, Wisper quickly outgrew Stooke's two-car garage that Wisper called home. By 2006, Wisper had grown from that first business customer to 2,500 customers and 16 employees. Wisper moved their operations into an old barn that had been renovated to fit the needs of the growing business.

As Wisper has grown, it's been very fortunate that the technology that powers our industry has grown, as well. Fixed wireless primarily requires line-of-sight between a subscriber and access point – that means that a treeline in the wrong place or a building being just a bit too tall can prevent someone from receiving service. Fortunately, Wisper was able to secure some 2.5 GHz EBS licenses. This spectrum is invaluable by allowing us to deploy new technologies like LTE that were not previously available in other unlicensed spectrum. This has proven to be an invaluable tool in providing high-speed Internet access to rural subscribers in Wisper's coverage area. In fact, in areas without the licensed band we can only provide service to approximately 30% of the residents whereas the LTE and some new non line of site equipment deployed in the licensed band allows us to service approximately 75% of the residents.

Today, Wisper is still headquartered at that quaint old barn in Belleville, Illinois but there are additional remote offices in Mt. Vernon, IL, Neosho, MO and Joplin, MO. Now boasting a staff of 56, Wisper is considered a leader in the wireless industry because of their creative problem solving, excellent customer service and experienced employees.

Wisper ISP provides high speed Internet to more than 10,000 business and residential customers located in Illinois and Missouri with plans to expand even more in the Arkansas/Missouri/Oklahoma market in 2016.



WISPER'S ST. LOUIS NETWORK

Customers and Leads Since September 2014



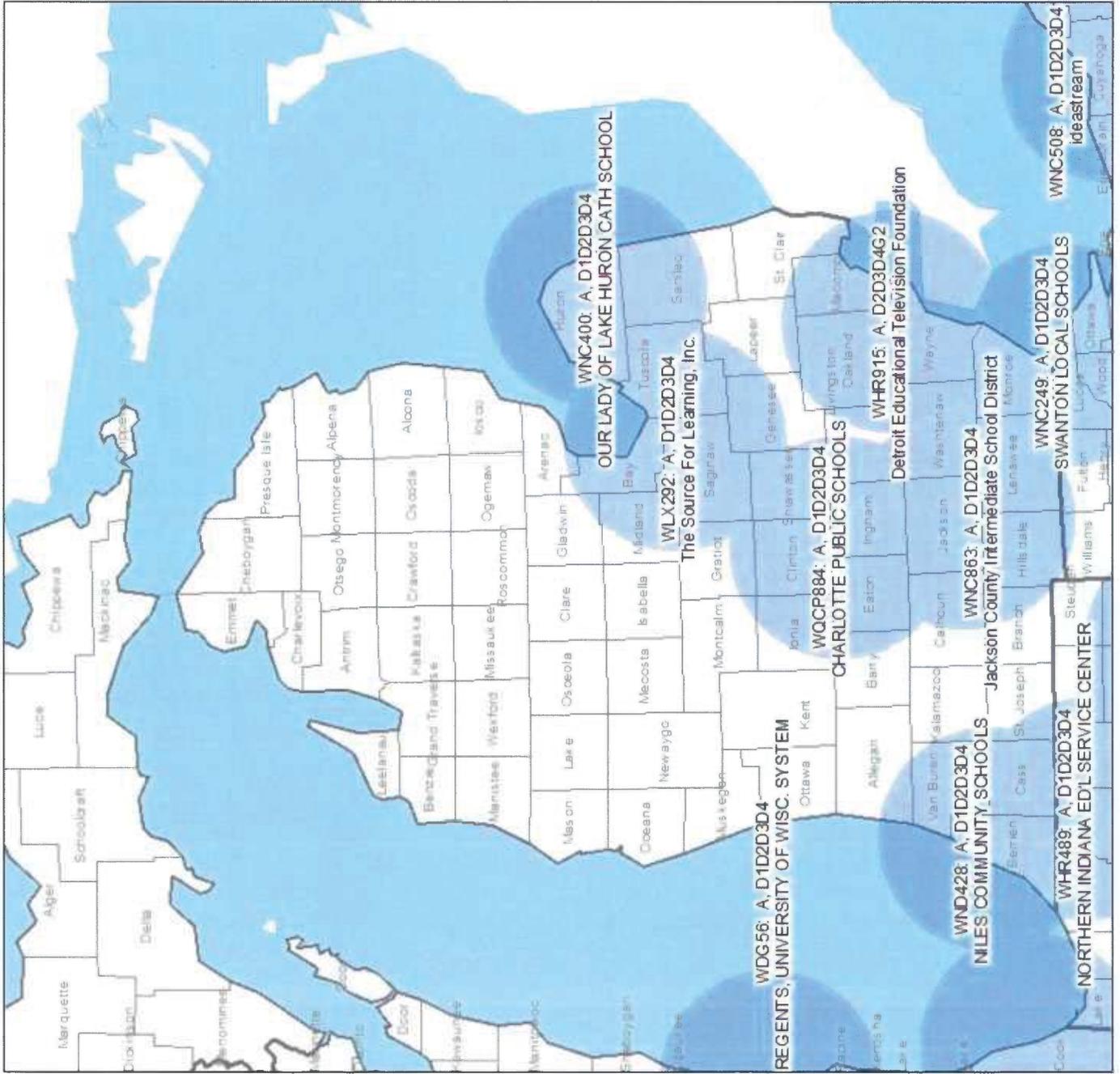
- 2,865 Customers that can not receive service
- 394 Customers installed on 2.5GHz
- 1,141 Customers on a waiting list in 2.5GHz area



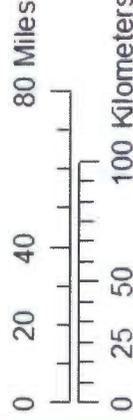
HIGH-SPEED WIRELESS INTERNET & TELEPHONE

Central Michigan EBS Channel D4

Currently Authorized GSA Boundaries



Date: 05 September 2013
 Coordinate System:
 NAD 1983 UTM Zone 16N
 Projection: Transverse Mercator
 Datum: North American 1983



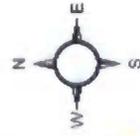
www.ComSpecCorp.com
 Broadband Telecommunications
 622 North Elm Street, Greensboro, NC 27401



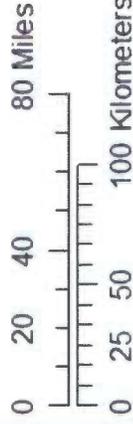
HIGH-SPEED WIRELESS INTERNET & TELEPHONE

Central Michigan EBS Channel D4

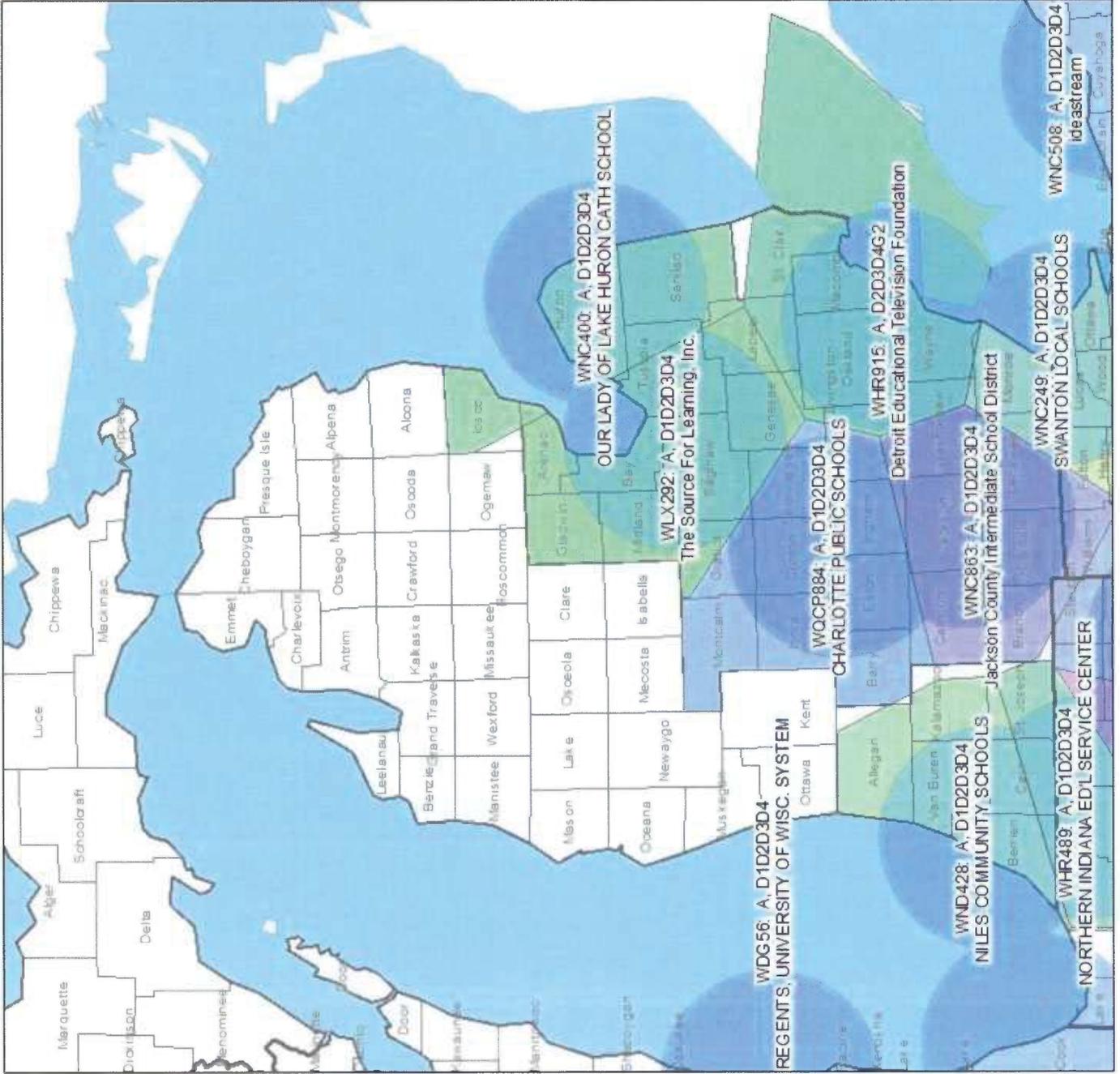
Currently Authorized And Proposed/Expanded GSA Boundaries



Date: 05 September 2013
Coordinate System:
NAD 1983 UTM Zone 16N
Projection: Transverse Mercator
Datum: North American 1983



www.ComSpec.com
822 North Elm Street, Greensboro, NC 27401



Springfield, IL

Max Reported DL	Population	Households
<3 Mbps	2,603	1,008
3 - 6 Mbps	12,166	5,472
6 - 10 Mbps	1,608	529
10 - 25 Mbps	42,324	18,935
25 - 50 Mbps	6,591	3,035
50 - 100 Mbps	2,512	1,203
100+ Mbps	2,457	1,011
Total	70,261	31,193

Rise GSAs
EBS P35s

FCC 477 Census Blocks - White Space Max Reported Consumer DL Speed

