

**Microlink D BBS**  
1940 Ford Street  
Golden, CO 80401

Federal Communications Commission  
445 12<sup>th</sup> Street SW  
Washington, DC 20554

Friday, April 19, 2002

To Whom It May Concern,

I have read your NPRM for rules levying USF fees for Wireless Broadband providers. (Proceedings 02-33) These fees do nothing more than feed the monopoly that led us to go into the wireless internet business in the first place.

In Colorado, Qwest and the other large ILECs have done a very mediocre job at best, providing internet access to spotty areas and have forced small operators like me to install wireless delivery systems to provide service to significant areas of the state.

These systems are supported like cooperatives and we're just barely making a profit to roll back into our infrastructure. The large ILECs take the universal service funds and pad their bottom line and are very non-responsive to providing high speed access in areas that are un-profitable in their business model. This is what the USF was created for and should be used for.

The USF funds are being put into the ILECs treasury with little or no return on these funds to the areas that are demanding it. Forcing the small WiFi carriers to charge these USF fees seems quite obtuse since we will never see any of these funds to expand our wireless networks, which by the way, are the only networks to cover the vast majority of our state.

We're very concerned about the bookkeeping and regulatory requirements that would have to be borne by us. The networks that we and our competitors run are being run on very slim margins and requiring these new fees of us based on either bandwidth or numbers of users is going to be cost prohibitive to us.

The absence of regulatory burdens on WiFi/802.11b/802.11a groups make it possible for ordinary people to form cooperative groups to share the costs of high speed internet service. This will significantly change our business model and confuse our customers.

We also feel that the financial burdens will hurt the groups that the USF was intended to help. The FCC should take heed of these issues and take steps to protect the groups actually working to foster the FCCs original, desired outcome.

Any new regulatory or fee burdens, no matter what public service these attempted to serve, are squarely against the intent of the Universal Service Fund and should not be levied against WiFi providers.

I strongly urge you to reconsider.

Sincerely,

John Maxwell  
Owner