

5/2/02

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

Re: CC Docket No.

02-33

Notice of

Proposed Rulemaking (FCC 02-42)

Dear Ms. Dortch:

On behalf of ShreveNet, Inc., I am writing to express my support for the comments filed on the above-referenced proceeding by The Wireless Communications Association International, Inc. ("WCA"), and to urge the Commission not to impose Universal Service Fund obligations on smaller providers of broadband services.

We are a small local business with a staff of 21. Since 1999, we have been using the license-exempt bands to provide high-speed Internet access to underserved communities. Even where cable modem or DSL is available, we are the only competitive alternative. Despite our small size and lack of funding from the government or the capital markets, we have been able to provide our customers with the type of broadband service usually available only in the larger cities, and we are doing so at an affordable price. We also are providing broadband service to schools, hospitals and governments, giving those entities the ability to use broadband to deliver better and more cost-efficient services to their constituents. The value of our service has been recognized by several local awards and outstanding public recognition.

Like any other small business, we face many daunting economic challenges but have only limited resources available to us. We therefore are very concerned about the possibility that the Commission will subject us to USF reporting and contribution obligations. Indeed, we estimate that our annual cost of complying with USF reporting obligations would be many thousands including the additional associated costs that we can ill afford.

While we generally support the broad objectives of universal service, we do not believe it is equitable to sacrifice the future of local independent broadband (which operates without subsidy) to support Incumbent carriers who do not even want to serve smaller areas.

We are not an ILEC or a cable MSO, and we simply cannot afford the personnel or administrative resources necessary for USF compliance. Any diversion of what little staff we have will have a direct and immediate adverse effect on our ability to serve our customers. Our business, in other words, would be put at unnecessary risk, and our customers ultimately would pay the price.

We therefore urge the Commission to take these considerations into account and, at a minimum, not impose USF reporting and contribution obligations on smaller local independent providers of broadband service. Thank you.

Very truly yours,

Allen Marsalis
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