

Dear Sirs,

Thank you for the opportunity to comment on the provision additional spectrum and its implications for the supply of Rural Broadband.

As a background we are a WISP in NE Wisconsin, we serve both urban and rural areas of our counties, with both dial up and Wireless broadband access, we have been offering these services now for three years.

We find that for our rural dial up customers the phone lines are often old and not too reliable for transferring Data, for these users there is no viable alternative, the cost of upgrading the rural phone lines and the time it would take, are just not realistic alternatives for a small Telco. The distances involved for Rural communities usually rule out both Cable and DSL connections,

This is the reason that Wireless Broadband is so important to local rural communities, we recognized this and have deployed our service to cover a large rural area. of approximately 2000 sq miles, we also work with another WISP North of us in Marionette county to offer joint service to rural areas.

The most economic system to deploy is the 802.11b equipment, BUT it is also the least secure and the one most subject to accidental interference, it vies with Ham operators, Public Services, other would be ISPs, all of these are legitimate users but are at this time all treading on each others toes. This is at the time of writing probably not a big problem in rural areas, however with the spread of blue tooth and other 208.11b devices it is likely to become more and more congested in all areas.

The other obstruction to providing Wireless Broadband to rural areas is the power limitations on that particular piece of the spectrum, it will not in its present form EVER provide a service to the majority or rural dwellers, this is because most rural areas are heavily treed and 802.11b in its present form just will not overcome this obstacle.

Generally speaking Rural dwellers do not have the same disposable income as do urban dwellers, it is therefore important to keep down the costs to these areas, not only the MRCs but also the initial cost of setting up the service.

If we look at the national, rural scene, the provision of Broadband access and Data transfer (Internet access ) has , up to now been provided in the majority of cases by the small WISPs throughout the country, it has been done without any recourse to Public funding, This has been for many of us a difficult task, we have raised funds from family and friends and built out the service IN SPITE OF the restrictions on the 2.4 Gig band, This new and refreshing approach by the FCC can, if it is used properly set the scene for total coverage of the whole country.

So, with the above in mind what can the FCC do to help in the swift deployment of Rural Broadband, our thoughts are as follows.

First the FCC must determine in what slice of the Spectrum we can provide this service. If we are to continue to use the unlicensed bands then the power requirements of those bands should be able to support a signal in all areas, and across most terrains, for a significant radius. I do not believe that the future lies in the Unlicensed Spectrum as it now stands, by its inherent characteristic, and name it will always have issues with overpowering and interference, but to be able for us to come out of it we need help and guidance from the FCC, Remember that if we have to move frequencies then all the equipment already deployed will become REDUNDANT, this will cause hardship to a lot of WISPs and a lot of users. So please take this into consideration in your deliberations.

By providing additional spectrum in the 3 Gig and 700Mhz bands you are moving in the right direction, but if these bands are to be unlicensed then you must make some commitment to ISPs and Telcos that the bands will not be open to every kind of application, they should be reserved

for DATA transmittal, otherwise we will be back in the same situation as we are now with the 802.11b band, too little spectrum for too many different users.

On the other hand If the Spectrum issued for provision of Broadband is to be in a licensed band, then provision should be made to help the small WISPs who are already providing significant broadband access to rural areas move into this band.

Thank you for your consideration and time, I hope this letter may be of use to you and that you can find a way to come to a solution which will benefit all parties.

Yours Sincerely,

Roy Preston.

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