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REPLY COMMENTS GN DOCKET# 04-163
IN THE MATTER OF FCC TASK FORCE WISP INQUIRY

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JUL 1 - 2004
2004 JUL 1 P 12: 41
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To Ms. Marlene H. Dortch, Commission's Secretary
Fcc at 445 12th Street S.W. #TW-A325
Washington D.C. 20554

1. SUMMARY

I submitted my Comments on this subject which Comments were received by the Commission on 2nd Instant and are listed, as view, at position #1 in the FCC's electronic record. My views are a part of some 32 comments, including one submitted as VIEW, submitted by others on behalf of entities, that claimed to be driving forces behind the stage WISP finds itself in in this day and stage.

By and through the means of these REPLY Comments I mean to set the REcord, on WISP GROWTH Sraight to show that the WISP growth has amounted only to

1. squandering of the Broadbands and other bands given away or sold to highest bidders by FCC.
2. creation of high hopes on the part of all of Web surfers (individuals and business entities other than Baby Bells and entities, masquerding as Communication stalwarts, to avail of opportunities to profit from the opportunities presened by the Ownership of BROADBAND SPECTRUMS.
3. RAINFALL Profits for those who had access to the investment capital of the Venture Capitalists and Investment Bankers, and sought and relied on the blessing of FCC .
4. Hackling opportunities for untold number of people who had a working knowledge of the source codes developed by those who had access to the venture Capital, and who had a lot of time, to burn, on their hands.

I'm not an attorney. But I do hope that my input is given a weight atleast equal weight to the input of attorneys of the Stalwarts.

2. INTRODUCTION

In response to the Inquiry issued by FCC Taskforce on the WISP, Growth created directly or indirectly by the deployment of

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the Broadbands sold or given away by FCC and unused TV Channels, some 32 for-profit and not for profit ENTITIES, not including me, submitted their Comments, to sway the Commission to further their efforts in the development of furthering the WISP development at the expense of the others.

These comments had one thing in common. They

1. IGNORED THE NEEDS of consumers who were duped into purchasing each and every cellular device manufactured by each and every major manufacturer like Nokia, Ehricksen, Motrola, Samsung and others.

2. sought the FCC BLESSINGS for the new and unnecessary technologies developed by them that can't be deployed through the use of the cellular devices alluded to in immediately preceeding subparagraph.

3. made an attempt to make an un-necessary distinction between AIR Bands knocking AIRBANDS OF one FREQUENCY and Immortalizing AIRBANDS of another FREQUENCY. The Goal of such an attempt is merely to pursuade FCC to allot some bands to them.

My aim in making my original and these reply Comments is to request FCC to change its SPECTRUM ISSUANCE POLICY so that I can make the centralized Processing a reality. This centralized Processing will create a perked up demand for the handheld cellular devices that have alreadt been developed and are already owned and possessed by some early birds who had hoped to surf the internet without having to carry their Laptops to hot spots in the middle of the nights and risk getting mugged so that their mugger

will than own these stolen Laptops without ever needing them except to trade rgem away for a buck or two.

It is heartening to know that MIcrosoft added its two cents without making a stand on any of the issues only to express the satisfaction it is having in increasing its cash reserves inspite of its considerable expenses in the form of settlements with its rivals accusing it of monoply and of heavy fines.

DISCUSSION OF MY REPLY TO THE COMMENTS

A. RESPONDENTS, TO THE INQUIRY, HAVE ONLY SOUGHT THE FCC BLESSING FOR NEW AND NOVEL METHODS OF DATA TRANSFER

(i) These Respondents have assumed that Consumers, whether Individuals or Business Entitities, have only one need. And need is to effect a Data transfer at highest possible speeds, not by any means, but by Wireless means.

(ii) And the Reason for a Wireless Data Transfer, seem to the Respondents to be, That they have to justify the procurement of the Wireless Spectrums from the FCC, although most of the Spectrums, Procured from the FCC, have been deployed, by their owners, to offer Moboile or Cellular Voice Communications

(iii) As a matter of fact most of the efforts of the Communications Industry are aimed at developing new and novel means to achieve that end or to develop a protocol to achieve that end. As a matter of fact, all of the Providers of the Internet service, in bankruptcies now or in the past (not necerally having anything to do with Wireless Internet Service) justified a need for their service by pointing their efforts in regard to VOIP to the Bankruptcy judges like Judge Gould).

(1v) Be the Wireless Data Transfer efforts as they may, The Respondents have shown their immaturity by trying to convince the FCC that a Wireless Data transfer Capability is all that is needed and FCC would be well advised to hand over all the unused spectrums (not necessarily unused TV channels) to them.

(v) AS a matter of fact The aim of Wireless or any other Data Transfer is to artificiallly keep alive an obsolete method of delivery of internet service developed as a reult of opportunistic availability of Financia Resources rather than because of an intelligent use of the Financial resources needed to develop a Method of delivery of an efficient Internet Services free from destruction from the Hackers.

(vi) Hence the respondents have wasted the FCC time by trying to convince it that one wireless transfer is more desirable (probably the one, not possessed, by the Respondents).

B. <u>ONLY I'VE SHOWN THE NEED TO DEVELOP THE TECHNOLOGY THAT IS NEEDED TO DELIVER A WIRELESS INTERNET SERVICE THROUGH THE DEPLOYMENT OF HANDHELD SETS THAT HAVE RECENTLY BEEN MANUFACTURED AND SOLD TO CONSUMERS WHO ARE NOW BEING TOLD THAT IT WOULD BE NECESSARY FOR THEM TO ACQUIRE OTHER MEANS OF ACCESSING A WIRELESS INTERNET SERVICE.</u>

(i) One of the respondents, QUALCOMM, is making a Case, before the FCC for the deployment of a technology that would deploy MDSFTTFS bands at 2150-2162 MHZ and 2500-2960 MHZ bands without disclosing whether deployment of these bands would make it possible to use the wireless handsets that are being paddled to the Consumers by the cellular and Mobile Companies like Cingular, Veerizon, T-Mobile or Nextel.

(ii) QUALCOMM has boasted of the wireless internet Service it has sold to its 30,000 subscribers that deploy these spectrums. But Qualcomm has remained mum as to whether its subscribers avail of this service by using the wireless handheld sets or do they need Laptops whose owners are given a list of locations where the spectrums of said frequency are more easily available than the hot spots needed by QUALCOMM non-subscribers.

(iii) In my original Comments I alluded to the acquisition of AT&T Wireless subscribers at a bargain price of $1900 per subscriber for a total cost of $41,000,000,000 ($41 Bil) which price would have been higher if AT&T Wireless had not allowed Cingular to bid at the

close of the bidding Process. Now Cingular is proposing a different standard that might prove to be more profitable than the standard it bought from AT&T wireless. Cingular has called this standard "Universal Mobile Telecommunication System ("UMTS").

(iv) similarly Nextel wireless has lunched the trial of some system in the Raleigh-Durham area that would allow download speeds of 3 Mbs although it is trying to pull wool over the eyes of its customers in that the high download speed does not translate to higher net speed of Internet service because it increases the idle time of PC processor as has been amply demonstrated.

(v) But none of the Respondents to the FCC Inquiry have shown any benefit of faster deployment of wireless Spectrums. Only thing the respondents are trying to achieve is to increase the cost to the Consumers and to achieve a fragmentation of the Communication Industry. The Respondents have not shown any need for the Consumers for a transition to Wireless other than for false promises of a pie in the sky.

C. NOTWITHSTANDING THE EXISTENCE OR NON-EXISTENCE OF A NEED FOR A FAST WIRELESS DATA TRANSFER, IT WOULD BE A TOTAL IGNORANCE TO IMPLY, IN ANY WAY, THAT THE AIM OF DELIVERY OF WIRELESS INTERNET SERVICE IS ACCOMPLISHED UPON THE DELIVERY OF A DATA TRANSFER CAPABILITY.

(i) Lot of respondents have assumed that the delivery of a fast Internet service means delivery of a very high Data Transfer rate capability.

(ii) some respondents like Dobson Communications Corporation, SES Americom, Sprint, IP WIRELESS, INC., among others, have proudly described the increase in Data Transfer Rates delivered by the Technologies developed by them, others like School Board of Broward County have called for wireless Technologies that would deliver even higher Data Transfer rate Capability.

(iii) As a matter of fact even the Commission's Task force is interested in the achievements in this regard and have included a question or two in its Inquiry to gather facts in this regard .

iv) This Data Transfer necessity is artificially created by the piecemeal development of the Internet Delivery system consisting of Client, Server and CGI. The system was developed at the outset of the development of the Personal Computers ("PCs") and before anyone had visulized the explosive growth in the Internet traffic and before anyone had evaluated the ability of the piece-meal developed internet system.

(v). The system has been a haven for Hackers, pornographers. The high Data Transfer rate Capability has been a haven only for the hackers who have been a headache for Microsoft, AOL and every entity that maintains files on line.

(Vi) JUst ask Microsoft how many security patches have been created by them. These security transfers are themselves a source of trouble. It is very difficult to know if the security patches themselves are infected with viruses.

(vii) The high rate Data Transfer Rate Capability itself is a headache for Music Industry, Software Industry because it leads to the theft of intellectual Property. Having failed to pursuade Congress to enact laws to ban the downloading of the Intellectual property the music and software Industry itself are penalizing the parents of Teenagers who make use of this high Rate Data Transfer capability to download the intellectual property of any one.

(Vi) is this why FCC is issuing its Wireless Spectrums? It is time FCC stopped providing its Wireless Spectrums in any frequency no matter how forceful argument is provided to FCC in regards technology related to Data Transfer.

D. INSPITE OF CLAIMS REGARDING ACHIEVEMENTS AS TO HIGH DATA TRANSFER RATES MADE IN THE RESPONSES TO WISP INQUIRY WIRELESS INTERNET SERVICE REMAINS IN A VERY PRIMITIVE STAGE THAT SHOULD CONCERN FCC.

(i) this is the Claim I made in my Comments regarding the Stage Wireless Internet Service finds itself to be in. No responses

have been made by any respondents to refute my claim.

(ii) As a matter of Fact QualComm seemed to be backing my claim at the start of its response when it stated that "current market Place Conditions establish that a Wireless Broadband Technology can't entirely meet service demand if it enables the provision of high Speed Wireless Service in hot Spot but not everywhere".

(iii) THe Qualcomm response goes to state that Wireless Internet Service should not be made someone with a Laptop and not to sot to some one cell phone or a PDA.

(iv) having made that claim in its response Qualcomm starts paddling its technology development that does not atleast entirely make it possible to access the Internet service through the use of a cell phone or a PDA or with a Laptop outside a hot zone and not equipped with a wireless Card.

(V) The reasons for the inability of such devices to access the Wireless Internet service is that such access is impossible as long as the Browsing Systems requires a Laptop or a browsing device to have a memory and processing Capacities.

(v) For the Internet service to be made available with a device lacking processing Capacity, the infrastructure has to be redeveloped so that all Processing is done at the Server level. SErvers are owned by parties not inititiating internet service. Hence the Hacking of others personal Computers can't be done.

(vi) Hence the Wireless Internet Service would remain in a primitive stage unless the manner of delivery of Wireless or on line Internet Service is Over hauled completely.

E. DEPENDENCE ON THE PRESENT SYSTEM OF DELIVERY OF INTERNET SERVICE IS LEADING TO TRANSFER OF JOBS OVERSEAS FROM DEVELOPED COUNTRIES.

(i). Every respondent, to the WISP Inquiry, Ranging from Industrial entities to Educational Entities has stressed the importance of increasing the Data Rates. Many have computed the times required for transfer of huge quantities of Data at verrious Data Transfer

rates possible with different modems or devices.

(ii) These respondents have ignored a very important consideration. The labor costs. THe necessity for Data Transfer is causing the transfer of related jobs to overseas places.

(iii) I've shown that Internet service delivery systems are avaiable that do not require the transfer of Data At all.

(iv) Such processing methods were in Vogue before Messers Jobs and Gates took the helms of the World in to their Hands.

(v) The situation calls for a Review of the SPECTRUM Issuance Policy by FCC.

(vi) FCC can't allow its SPECTRUN Policy to be determined by DATA RATE CONSIDERATIONS no matter how pursuavise are the advantages for one Data Transfer Technology in relation to another Data Transfer technology.

F. THE PRESENT SYSTEM OF INTERNET SERVICE DELIVERY, BASED UPON DATA TRANSFER, IS BANKRUPTING THE EDUCATION COMMUNITY.

(i) The Respondents to the WISP enquiry included atleast one Respondent from the Educational Community.

(ii) This Respondent only stressed one point. The importance of high Data transfer rate from the point of View of the Students.

(iii) The response shows that the Educational Community has been misled in beliving that the internet delivery system requires a transfer of Data and an ever present Downloading Necessity.

(iv) This downloading can be totally done way with by dicarding the present system of delivery Internet Service.

(v) Every teenager has a cellular phone equiped with a Camera.

(vi) many of these devices can send written messages. Such cellular devices are all a student needs to surf the net and these students can be put to work digging information on-line instead of spending their minutes chatting with friends of opposite sex (and sometimes of same sex).

(vii) All that is neede is the development of a Technology that was in place four decades ago and discarding of a Technology that made silicon valley millionnaires at the cost of working class.

4. CONCLUSIONS

(i) I had made a prediction in my original Comments, entered, as "VIEWS" in the FCC ELECTRONIC COMMENTS Record at position 1.

(ii) My prediction related to the fact that the Questions, in the INQUIRY" were not adequate to show that the WISPS are in very primitive stage.

(iii) I was proved to be right in that the respondents tried to explain the situation away by stressing the need for Spectrums with Bands for different Frequencies.

(iv) Most respomdents were, however jublient, that they were providing the highest Data Transfer rates.

(v) In my two presentations I have shown that people are being misled into believing that the best that can be done for them is to is to provide them the highest possible Data Transfer rates.

(vi). People ask for a method to surf the internet and what they get is a method to download that is getting them into trouble with the Law.

(vii) These people are being made to buy laptops and Cellular devices that are being used to steal intellectual property and get into trouble with the law.

(iX). FCC can change all that by reviewing its Spectrum issuance policy to put spectrums in right hands that can reshape the deployment of the Spectrums atleast as for as WISPS are Concerned.

Respectfully submitted

-151-

Satish Bhardwaj

Sent June 29, 2004