

Sirs:

I and my wife operate LARIAT.NET, the world's oldest and longest continuously operating broadband Internet service provider. We have been offering wireless broadband Internet service to areas not served by DSL, cable modem, or any other terrestrial broadband service since 1993. Due to the rampant speculation, spectrum hoarding, and artificially created scarcity that has been created by the auction process, we have, and will for the foreseeable future, operate our service on unlicensed spectrum, using the best available equipment and careful engineering techniques to deal with the growing clutter on these bands. Until and unless there is an economically feasible way of acquiring licensed spectrum, providers like ourselves -- which provide a vital service to rural businesses and residents as well as those in search of broadband alternatives -- will continue to use the Part 15 spectrum to serve our customers.

The present proposal threatens to precipitate a crisis in the most used and most popular unlicensed band by allowing fully 50% of it to be obliterated by needlessly powerful amateur radio transmissions. What's more, because the most common protocol used on the band is IEEE 802.11b, which divides the band into only three nonoverlapping channels, Wireless broadband providers operating on 2.4 GHz will lose two of three possible channels.

There is no justification for this. Amateur radio activity on the 2.4 GHz band cannot be justified by a need for experimentation; the usefulness of the band is already well proven. Nor can it be justified on the basis of hams' ability or willingness to engage in emergency relief activities; ample spectrum is available for that on other bands.

We therefore ask that the FCC not only deny the present petition but also open, sua sponte, an inquiry into eliminating use of the 2.4 GHz Part 15 band under Part 97. So long as wireless broadband providers do not have access to licensed spectrum, they and their customers should not be threatened with the loss of vital broadband service because an amateur wishes to engage in a hobby.

Sincerely,
Brett Glass
LARIAT.NET