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March 1, 2007

**VIA ECFS**

Ms. Marlene Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, D.C. 20554

**Re: M2Z Networks, Inc.**  
***Application for License and Authority to Provide National Broadband Radio Service in the 2155-2175 MHz Band; Petition for Forbearance under 47 U.S.C. § 160(c) to Permit Acceptance and Grant of Its Application***  
**WT Docket Nos. 07-16 and 07-30**

Dear Ms. Dortch:

On December 18, 2006, the Electronic Retailing Association (“ERA”) sent a letter to Chairman Kevin J. Martin supporting M2Z Networks, Inc.’s (“M2Z”) Application for License and Authority to Provide National Broadband Radio Service in the 2155-2175 MHz Band (the “Application”). The ERA letter was subsequently included in the record of the above-referenced proceedings.

ERA’s letter discusses several studies on the growth of electronic commerce in recent years. The first, from the U.S. Census Bureau, reports that 26.3 billion dollars worth of retail transaction were completed online in the second quarter of 2006 alone. ERA also reports based on its own research that the electronic direct response industry generated \$323 billion of commerce in 2005, of which \$70 billion or 22% is attributable to online retailing activities. Finally, a study from the National Federation of Independent Businesses finds that only 57% of small business owners use the Internet for business-related activities and only 35% have web sites. These numbers demonstrate the critical role of Internet access in the U.S. economy yet also highlight the disadvantages that many small businesses continue to encounter because they do not such access. M2Z’s entry into the broadband market will provide an affordable service alternative for the broadband Internet access driving the nation’s economy. This result will significantly promote the public interest.

Accordingly, in the interests of establishing a more complete record in this proceeding and aiding the Commission in evaluating the public interest benefits of granting M2Z’s

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Application, either directly or under the Commission's forbearance authority, the following studies referenced in the ERA letter are submitted herewith:

- *Quarterly Retail E-Commerce Sales, 2nd Quarter 2006*, published by the U.S. Census Bureau (Aug. 17, 2006) (\$26.3 billion dollars worth of retail transactions were completed online in the second quarter of 2006 alone).
- *Industry Research, Facts & Figures on the Electronic Direct Response Industry*, published by ERA (the electronic direct response industry generated \$323 billion of commerce in 2005, of which \$70 billion or 22% is attributable to online retailing activities).
- *National Small Business Poll on the Use and Value of Web Sites*, published by the National Federation of Independent Businesses Education Foundation (2001) (only 57% of small business owners use the Internet for business-related activities and only 35% have web sites).

If you have any questions concerning this matter, please do not hesitate to contact the undersigned.

Sincerely,

/s/

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Enclosures