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September 13, 2010

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: TV White Spaces
ET Docket Nos. 04-186 and 02-380

Dear Ms. Dortch:

My company, Desert Wireless Internet, provides fixed wireless broadband service in the Victorville - Barstow area of the Southern California High Desert. We rely primarily on unlicensed spectrum to deliver broadband services to consumers that have no terrestrial broadband choices. We built our network from scratch using devices authorized under Part 15 rules the FCC adopted to open up 900 MHz, 2.4 GHz and 5 GHz spectrum for unlicensed broadband devices. Thanks to the Commission's initiatives, consumers in the High Desert area can now get broadband service. We have recently expanded our services to include Newberry Springs, CA and are actively working on a partnership with local schools so that their students can use the facilities they, the schools, are providing for parents and students.

Desert Wireless Internet is very interested in utilizing television white spaces so that we can expand and improve our service offerings. Currently our spectrum is overloaded with usage. Everyone from local governmental agencies to the Military is using that spectrum that we currently use. We are committed to deploying as soon as equipment for point-to-multipoint service is commercially available.

I am pleased that the FCC will be acting on TV white space petitions for reconsideration in the near future. There are several proposals that would help us to deploy service:

First, the FCC should allow WISPs to operate using base station antennas mounted higher than 30 meters, and we should be allowed to install customer antennas (CPE) at heights below 10 meters. If we could increase our base station antenna height to 100 meters, we could cover three times more area with a base station and reduce our equipment, tower acquisition and tower lease fees by a large amount – an amount that could be the difference between deploying and not deploying in an area. Desert Wireless does support the WISPA and Motorola proposals to increase base station height. By removing any minimum CPE height restrictions, we would not have to put tall masts on a residence which does not appeal to potential customers and we would be able to provide service at a lower cost which, as you know, is a prime consideration in today's economic situation. People all over our nation are trying to find ways to cut their expenses while still trying to maintain necessary services. As you well know, Broadband Internet service to the home has become a necessity for our citizens.

Second, we believe we should be allowed to operate with power in excess of 4 Watts EIRP in rural areas. As is the case with tower height, operating with higher power will give us a greater coverage area and we will not need to spend as much money on infrastructure.

Third, we are very concerned about a proposal made by FiberTower and others to license white space spectrum for point-to-point wireless backhaul. Not only would adopting this proposal take six channels (36 MHz) and perhaps more channels away from us, but WISPs also would have to protect these licensed links. Moreover, channels and areas far beyond the links would be blocked because the signals from the licensed links would overshoot the path and the endpoints. This is due to the low-cost, low-gain antennas FiberTower wants to use. We also would not deploy if a licensed point-to-point user could come along later and put us out of business with a licensed link. We support the views expressed by WISPA in their September 8 letter and ask the FCC to reject the FiberTower proposal.

This issue is extremely important to our industry and our nation. The ability for operators such as ourselves to provide this very necessary service, as evidenced by our President's commitment to Broadband, as outlined in the WISPA comments is extremely important. WISP operators are the true backbone of the initiative to bring Broadband Internet connectivity to our citizens that do not live in urban areas. Most of us have built our systems from our own pockets and are not afraid of new technologies that we can use to expand our services. I feel that it is essential that we, those entrepreneurs who have proven their ability to deliver, be able to move our nation forward and deliver better services to our citizens through the use of this spectrum.

Cordially,

A handwritten signature in black ink that reads "Tim Harris". The signature is fluid and cursive, with the first name "Tim" being more prominent than the last name "Harris".

Tim Harris, Managing Partner
Desert Wireless, LLC
www.desertwireless.net