

ZIRKEL Wireless
1625 Mid Valley Dr. #1 Suite 129
Steamboat Springs, CO 80487
September 14th 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, ZIRKEL Wireless, provides fixed wireless broadband service in Northwest Colorado including Routt and Moffat counties. We rely primarily on unlicensed spectrum to deliver broadband services to consumers that have no, or few 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 Northwest Colorado can now get broadband service. Being in the rural mountains delivering broadband requires a wireless solution because it would be nearly impossible to run wire or fiber to the remote locations. We are currently providing high-speed Internet to many locations that do not receive electric, phone, TV, or cell phone service. We have been able to accomplish this because the spectrum was free for us to use and therefore the barrier to entry was lowered substantially.

ZIRKEL Wireless is very interested in utilizing television white spaces so that we can expand, and improve service. The mountainous terrain presents many obstacles for delivering broadband. Most of our connections have to be line of site or near line of site (maybe one tree obstructing the signal). although we have reached many un-served and un-derserved residences and businesses there are still many who cannot receive service because they do not have line of site to our extensive network. The TV white space spectrum at a strong enough power level can over come these obstacles and deliver this much need service to these remote locations. 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. We 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 residences and we would be able to provide service at a lower cost.

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.

We look forward to being able to deploy new equipment in the TV white space spectrum and deliver high-speed Internet to many more rural areas that have been difficult to serve.

Sincerely,

Sean Heskett, Owner