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September 14, 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, Intelligent Computing Solutions, provides fixed wireless broadband service in Northern Illinois. We rely primarily on unlicensed spectrum to deliver broadband services to consumers that have 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 Northern Illinois can now get broadband service. We are affiliated with multiple middle mile BTOP recipients and access to adequate spectrum is crucial in the full realization of ubiquitous fixed broadband.

Intelligent Computing Solutions is very interested in utilizing television white spaces so that we can expand service. I have been graced with some flat treeless terrain in portions of our service area and can provide a competitive, nearly ubiquitous broadband service. However, there are portions of our intended service area that are just too difficult to service with currently available spectrum. There are areas we would love to service, but full mature tree lines every couple miles attenuate the currently available signals too much to provide a viable broadband service. 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 or 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.



INTELLIGENT  
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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.

Thank you for your time, and I hope you give serious consideration to WISPA's proposals. To contact me, please call 866-323-2798 with my personal extension being 200, my mailing address is at the top of this letter, and my email is [mhammett@ics-il.net](mailto:mhammett@ics-il.net).

Sincerely,

Mike Hammett  
President  
Intelligent Computing Solutions, Inc.