

Grand County Internet Services Inc.
PO Box 1691
Grand Lake, Colorado 80447
9/15/10

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, Grand County Internet Services Inc. (GCIS) provides fixed wireless broadband service in Grand County, Colorado. 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 the Grand County, Colorado area can now get broadband service. GCIS is the only area provider reaching into areas that Cable and DSL will not provide services to.

GCIS is very interested in utilizing television white spaces so that we can expand or improve service. In our area, we are a Mountainous area. We still have had to deny service for nearly 40% of the requests due to trees, power and frequency limitations. The current lower frequencies have insufficient bandwidth and power not for only today's applications, but the future growth of the National Broadband Plan. 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.

Legacy carriers are trying to 'reserve' frequencies just in case they *ever* expand to the areas and organizations like Fiber Tower want to *exclude* everyone but themselves from the future of Internet expansion. WISP's built the Internet based on a need for strong community relations and small business entrepreneurial spirit, we hope the FCC's intent is not to provide only investor driven corporate expansion opportunities versus the fiscally responsible manner we have demonstrated. WISP's have never stopped at a census line based on feasibility; we are driven by a level of commitment to our community so everyone can obtain high-speed Internet.

Sincerely,

Eden Recor, Grand County Internet Services
President