Alex Goldman
AG Internet Knowledge, LLC
September 16, 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:

I have covered the competitive ISP industry since the year 2000, first for www.isp-planet.com and now for wispa.org. Time and time again, I have seen public resources devoted to companies that will not use them. Spectrum is as valuable as land. This spectrum will allow many ISPs that are small businesses in rural areas to provide service to customers that have already requested it but whose location, in wooded or other difficult to reach areas, made them unreachable with current spectrum.

These small businesses have benefited from 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 across the USA can now get broadband service.

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 to install customer antennas (CPE) at heights below 10 meters. A height of 100 meters would allow WISPs to cover three times more area with a base station – an amount that could be the difference between deploying or not deploying in an area. I support the WISPA and Motorola proposals to increase base station height.

Second, I believe WISPs 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 WISPs a greater coverage area and will reduce costs, benefiting rural customers.

Third, I am 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-coast, low-gain antennas FiberTower wants to use. I support the views expressed by WISPA in their September 8 letter and ask the FCC to reject the FiberTower proposal.

I hope that the FCC will not give away spectrum as it has in the past for the price of pennies on the dollar, in terms of value earned (http://www.isp-

planet.com/fixed_wireless/politics/2007/spectrum_giveaway.html). Instead, I hope that the FCC will embrace the opportunity to encourage free enterprise, competition, and the growth of rural small businesses by making the TV white spaces a moderated commons much like the successful regimes in WiMAX and Wi-Fi. The FCC should pursue the spectrum management policies that, in the past, have led to its greatest successes.

Sincerely,

Alexander Goldman
Principal
AG Internet Knowledge, LLC