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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, 3-dB Networks, provides fixed wireless equipment, and consulting services to Wireless ISPs throughout the US. Our customers provide a valuable service to their local communities by delivering broadband Internet to consumers and businesses that have few or no broadband options. They rely primarily on unlicensed spectrum, 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 along with the hard work and investment of our customers, over 25,000 families and businesses can now get broadband service.

Our customers are very interested in utilizing television white spaces to expand and improve their service offering. Television white spaces will enable them to reach customers that have not been economically feasible to reach to this point, primarily due to foliage obstructions. Television white spaces will also enable them to upgrade capacity in areas where they currently lack spectrum resources due to congestion.

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 our customers deploy service:

First, the FCC should allow WISPs to operate using base station antennas mounted higher than 30 meters, and allowed to install customer antennas (CPE) at heights below 10 meters. By increasing the base station antenna height to 100 meters, WISPs could cover three times more area with a base station, reducing equipment, tower acquisition and tower lease fees significantly – 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. Removing any minimum CPE height restrictions, would eliminate the requirement to put tall masts on residences, thus lowering the cost to deliver service.

Second, 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 WISPs, 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. WISPs would also be very hesitant to deploy if a licensed point-to-point user could come along later and eliminate their ability to offer services in that area. We support the views expressed by WISPA in their September 8 letter and ask the FCC to reject the FiberTower proposal.

Sincerely,

Todd Bergstrom, CEO