

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 am an Amateur Radio operator, N4NFP and I have an interest in seeing wireless internet become more available in rural areas. I would like to comment on the mentioned and what it means to rural internet users all over the country.

WISPs rely heavily on unlicensed spectrum to deliver broadband services to consumers who have few (or no) broadband choices. They frequently use 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, many consumers in rural areas nationwide can now get affordable broadband service.

I am very interested in seeing WISPs utilizing television white spaces so that they can expand and improve their offerings. In the Southeast, the mountains, hills and tree cover make it extremely difficult to operate in the 2.4 and 5 GHz microwave spectrum. The lower frequencies perform far better in this environment. Unfortunately 900 MHz is has become completely unusable due to cordless phones, utility company meter reading devices and other consumer devices. In order to remain viable in the marketplace, WISPs need to have other options now.

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 my clients 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 they could increase base station antenna heights to 100 meters, a WISP could cover three times more area with a base station and reduce 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. I support the WISPA and Motorola proposals to increase base station height. By removing any minimum CPE height restrictions, WISPs would not have to put tall masts and towers at residences and would be able to continue to provide service at a low cost.

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 them a greater coverage area and we will not need to spend as much money on infrastructure.

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 WISP use, 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. Also a WISP might not deploy at all if a licensed point-to-point user could come along later and put them out of business with a licensed link. **I support the views expressed by WISPA in their September 8 letter and ask the FCC to reject the FiberTower proposal.**

Sincerely,

Frank Watts
Radio Amateur N4NFP