INTERNET COMMUNICATIONS INC.
Tyson Burris, *President*
Internet Communications Inc. • 211 Commerce Drive, Suite B • Franklin, IN 46131
Office (317) 738-0320 • Fax (317) 738-0215
info@franklinisp.net • http://www.franklinisp.net

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, Internet Communications Inc (ICI), provides fixed wireless broadband service in Central Indiana. We rely primarily on unlicensed spectrum to deliver broadband services to consumers that have few to no 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 and the recently approved licensed 3.65MHz spectrum. Thanks to the Commission's initiatives, consumers in rural central Indiana can now get broadband service that previously couldn't. The company currently covers six counties here (Marion, Johnson, Shelby, Morgan, and Bartholomew) and continues to expand at a rapid pace, which will include expansion and job creation in 2011.

Internet Communications Inc is very interested in utilizing television white spaces so that we can expand and upgrade services further. Our service area goes from one extreme (flat and obstruction free) to another (large hills, and heavy tree growth). This can result in solid coverage in one area and spotty to no coverage in another. By implementing TV white space, the company will be able to bring full coverage to all services areas without being impeded further by natural obstructions and or/insufficient towers in place. This will result in a win-win for the consumers and the Federal Government without taxpayer costs. We are committed to deploying as soon as equipment for point-to-multipoint service is commercially available for this to happen

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.

INTERNET
COMMUNICATIONS INC.
Tyson Burris, *President*
Internet Communications Inc. • 211 Commerce Drive, Suite B • Franklin, IN 46131
Office (317) 738-0320 • Fax (317) 738-0215
info@franklinisp.net • http://www.franklinisp.net

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.

After watching and reviewing the awards from the recent BIP, I have concluded that the originally intent of the program has not been fully productive. In fact, in many cases, taxpayer money has been wastefully handed out to corporations who will only decrease internal infrastructure spending (which would normally occur) and default to the BIP award instead. I also had observed a case in which BIP funding was awarded to a company in violations of SEC rules and regulations (this was later retracted). By allowing independent Wireless Internet Service Providers (WISP) the opportunity, we are able to achieve these goals without taxpayer money being wasted or misguided. I urge the FCC to reject current proposals on the table and open the market to those of us who can actually make this happen and have a record of doing so.

I am available for further conversations and testimony if needed.

Sincerely,

Tyson Burris, President
Internet Communications Inc.
211 Commerce Dr.
Franklin, IN 46131