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Friday, September 17, 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:

My company, Hahnron, Inc. provides fixed wireless broadband service in Lenawee and Hillsdale Counties, Michigan. We rely primarily on unlicensed spectrum to deliver broadband services to consumers that have 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. Thanks to the Commission's initiatives, consumers in the Southeast Michigan – Northwest Ohio areas can now get broadband service. However, because of trees, terrain, spectrum congestion, lack of available towers, and lack of lower frequencies (450 Mhz, for example) that can penetrate the arboreal vegetation (trees) network expansion is difficult to impossible.

Hahnron, Inc. is very interested in utilizing television white spaces so that we can expand and improve our level of service. Presently spectrum congestion, new areas, trees/hills, lack of available towers make service expansion difficult. Many areas service is available to one dwelling and 500 feet away service is unavailable due to one or more of the aforementioned problems. 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.

Finally, we implore you to make these TV White Spaces available for the use of the Wireless Internet Service Providers. These frequencies will allow WISPs to remain competitive with the largest telephone, cabletv companies, as well as the Googles, Microsofts and other large companies that want entry into the market slace of rural wireless internet service.

Sincerely,

Ronald E. Wallace
President
Hahnron, Inc.