

Great Lakes Internet Inc.

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Your Networking Specialists
Computer Sales Service and Repair

September 13, 2010

Received & Inspected
SEP 20 2010
FCC Mail Room

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, Great Lakes Internet Inc. of Croswell Michigan, provides fixed wireless broadband service in Sanilac, St Clair and Lapeer counties. We rely primarily on unlicensed spectrum to deliver broadband services to consumers that have no or few 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, over 1000 consumers in our service area can now get broadband service through Great Lakes Internet's Fixed Broadband Wireless rural infrastructure.

Great Lakes Internet is very interested in utilizing television white spaces so that we can expand and improve service to our existing and potential customers. We could service at least twice as many customers if we have new spectrum that would allow us to better penetrate, trees and install new towers in underserved areas. With 21 tower and vertical real estate locations 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 new service and improve service to our existing service areas.

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.

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. Money saved on infrastructure would allow me to expand my staff from 10 fulltime to 14 fulltime employees.

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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.

In today's depressed economy in Michigan any business that has the potential of increasing their full time staff by 40% is an asset to the local communities where they work and live.

Sincerely,

A handwritten signature in black ink, appearing to read "Clyde W. Messinger", with a large, sweeping flourish extending to the right.

Clyde W. Messinger
President
Great Lakes Internet Inc.