

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20554**

In the Matter of	)	
	)	
Wireline Competition Bureau Seeks	)	WC Docket No. 10-188
Comment on Business Broadband	)	
Marketplace	)	
	)	

**REPLY COMMENTS OF CELLULAR SOUTH, INC.**

Cellular South, Inc. (“Cellular South”), the nation’s largest privately-held wireless carrier – serving over 850,000 customers in primarily rural areas – submits these Reply Comments in the above referenced docket.

**Discussion**

On September 15, 2010, the Commission released a Public Notice in this docket seeking comment on various issues relating to the availability of services, technologies, and facilities within the business broadband market. Cellular South supports and underscores the comments of the Small Business Administration’s Office of Advocacy (“SBA”) regarding the impact of wireless spectrum access and device interoperability on the availability of wireless broadband.<sup>1</sup>

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<sup>1</sup> Comments of the Office of Advocacy, U.S. Small Business Administration, *Wireline Competition Bureau Seeks Comment on Business Broadband Marketplace*; WC Docket No. 10-188 (Oct. 15, 2010) at pp. 6-7.

The SBA's comments accurately reflect how competition in the mobile broadband marketplace is harmed by the lack of device interoperability within the 700 MHz spectrum. Cellular South agrees that the continued and prolonged absence of rules regarding device interoperability across the paired bands of 700 MHz spectrum has impaired and will continue to impair small carriers' ability to provide competitive wireless services to all consumers, including small business consumers.

Interoperability in the 700 MHz band would allow wireless carriers and wireless broadband consumers to benefit from economies of scale – creating greater incentives for carriers and device-makers to innovate and decrease costs – and would improve service, especially in non-urban areas, through greater coverage and seamless nation-wide roaming.

What's more – the current lack of rules regarding interoperability across the 700 MHz spectrum harms not only smaller wireless carriers; it also harms existing small business consumers and reduces the potential for economic growth.

Small businesses accounted for 65% (or 9.8 million) of the 15 million net new jobs created in the United States between the years 1993 and 2009.<sup>2</sup> In other words, small businesses account for the overwhelming majority of our nation's employment growth. This fact resonates more acutely in the non-urban communities that smaller wireless carriers typically serve. Assuring that small businesses in these communities have reliable access to the latest wireless broadband technology at competitive prices will maximize their opportunities for growth and potential for job creation.

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<sup>2</sup> See, U.S. Dept. of Labor, Bureau of Labor Statistics, Business Employment Dynamics; Advocacy-funded research by Zoltan Acs, William Parsons and Spencer Tracy, 2008.

To enable these opportunities for small business growth and job creation, the Commission should act swiftly to implement rules regarding the interoperability of equipment and devices operating on compatible technologies in the 700 MHz spectrum.

Respectfully submitted,

**Cellular South, Inc.**

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Date: November 4, 2010