



March 26, 2012

**FCC:**

To borrow from WWI commander in Chief of the British army, Field-Marshal Sir Douglas Haig, do we, the country of the United States, have our" backs to the wall"? We all know, in times of crisis like World War II, the business and political leadership in this country will make the important decisions that need to be made to win. Consequently, with our backs to the wall, defense of the status quo is untenable.

In spite of the year after year productivity improvements (primarily delivered by new technology!), please see that our country is in a terrible financial predicament – more debt at all levels than ever in recorded history. The worst is yet to come. Of course, fixing our terrible bandwidth situation will not, unto itself, bail us out of our situation; however, it is a crucial step.

Advanta has been battling the corrupt practices of the entrenched ILEC and MSO's for 25 years. We have seen a lot. For example, we have seen, at tremendous cost to us and our customers, CLEC after CLEC go out of business. (The concept of attempting to throttle the ILECs by forcing them to share their copper with their competitors was ill-conceived to say the least.) Advanta is mostly bandwidth agnostic; over 25 years, we have vigorously chased down the dark alleys of Wifi, microwave, Clear Wireless, and even power of electrical wire concepts, searching for an alternative bandwidth solution.

High prices, indefensible price variances (.e.g. 20 MB fiber for \$99 vs. 20 MB fiber for \$2000 – only five miles apart), consistently poor service levels, and mostly the general lack of bandwidth availability are ample evidence that something has to change. If an SMB is not located in a multi-tenant high-rise in a major city or an individual does not live in a MDU or other high density, wealthy neighborhood, the choices for bandwidth are usually not competitive. You know this. Furthermore, if AT&T and Comcast are serving a neighborhood, if a new competitor arrives with similar pricing and service, they will instantly win 20% market share; in other words, 20% of people will jump just to escape these two companies.

The lack of ubiquitous, low cost bandwidth in our country is an incalculable anchor on our country's productivity. We can say that it is a 'rural' problem, but in reality, it is often not that rural. Walking away from opportunity after opportunity because of the unavailability of low cost bandwidth is, right now, is simply a cost of doing business for Advanta. A very frustrating cost.

Lightsquared may be yet another dark alley. To be fair, I am, in this letter, imploring you to do something radical about our country's bandwidth issues like finding a way for LightSquared to move forward, and I don't really know the character of LightSquared nor do I really deeply understand the technical specifics of why Lightsquared is not being permitted to broadcast on their licensed frequency. I AM inferring, if only from AT&T and Verizon's backroom legal actions, that LightSquared at least has the potential to disrupt the market and should be given the chance to try by the FCC.

One additional point: No one in their right mind would fund the building of a new skyscraper, if the building permit has a chance of being pulled at the last minute. With this LightSquared debacle, the FCC has a credibility problem – who will spend billions again, knowing that the FCC may rescind the frequency at the last minute?

I have no equity (nor debt) interest in LightSquared. We are very excited about offering our services to the new customers that LightSquared will make possible. If LightSquared can deliver on the technical and business propositions that they have presented to us, it will be very good for Advanta, our customers, and, in a small way, this country.

This is no time for nuance, caution, contemplation, and delay; this is a time for changing the game. If you will not permit LightSquared to go live, what is your next plan and how long will it take? We have our backs to the wall and time is short.

Regards,

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