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July 23, 2012

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

**Re: Notice of Oral Ex Parte Presentation
WC Docket No. 10-90, GN Docket No. 09-51, WC Docket No. 07-135,
WC Docket No. 05-337, CC Docket No. 01-92, CC Docket No.
96-45, WC Docket No. 03-109 and WT Docket No. 10-208**

Dear Ms. Dortch:

On July 19, 2012, representatives of the Wireless Internet Service Providers Association (“WISPA”) met with Commission staff to discuss issues related to the Commission’s ongoing Universal Service Fund (“USF”) proceedings. Attending on behalf of WISPA were Matthew Larsen, a WISPA Board member and owner of Inventive Wireless of Nebraska, LLC, a Nebraska wireless Internet service provider, and undersigned counsel to WISPA. Attending on behalf of the Commission were Carol Matthey, Patrick Halley, Joseph Cavender, Amy Bender, Alex Minard, Vickie Robinson, and Trent Harkrader of the Wireline Competition Bureau.

Mr. Larsen reviewed the attached presentation, which highlights WISPA’s positions on various USF issues. Mr. Larsen discussed the cost benefits of providing unsubsidized fixed terrestrial wireless broadband to rural areas of the country, and the need to ensure that Connect America Fund (“CAF”) support is not extended to “areas subject to unsubsidized competition” under the definition proposed by WISPA in its petition for reconsideration. The WISPA parties explained that the Commission should not require standalone broadband providers, who are not providers of “telecommunications” under existing interpretations, to contribute into USF. The WISPA parties reiterated their support of the “self-provisioning” proposal that would condition CAF support on the recipient’s obligation to allow interconnection so that unsubsidized broadband providers in nearby areas can provide service at lower cost.

The parties also discussed the Remote Areas Fund (“RAF”). Mr. Larsen discussed WISPA’s proposal for a voucher system whereby consumers subscribing to broadband service would submit documentation to the Commission, which would then issue payment to the provider. This would eliminate administrative burdens associated

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with other support methods and ensure that funds were provided only for consumers in remote areas. In connection with the RAF, the WISPA parties reiterated their support for a nationwide ETC system that would enable entities that are not providers of “telecommunications” to receive RAF support.

Pursuant to Section 1.1206 of the Commission’s Rules, this notice is being filed via ECFS in the above-referenced proceedings. Please direct any questions regarding this notice to the undersigned.

Respectfully submitted,

/s/ Stephen E. Coran
Stephen E. Coran

Enclosure

cc: Carol Matthey
Patrick Halley
Joseph Cavender
Amy Bender
Alex Minard
Vickie Robinson
Trent Harkrader

WISPA's Views on Transforming the Universal Service Fund

July 19, 2012

www.wispa.org



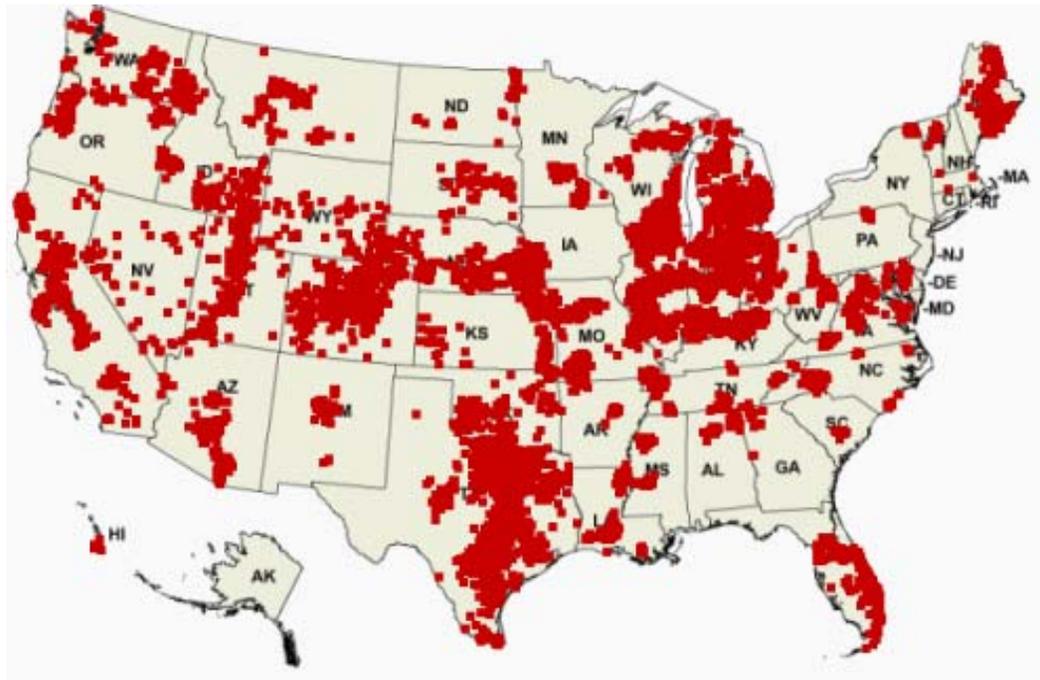
About WISPA

- Founded in 2004 by small group of WISPs
- Today
 - 700+ members . . . and growing
 - Two annual trade shows
 - Increasing commitment to advocacy and member services

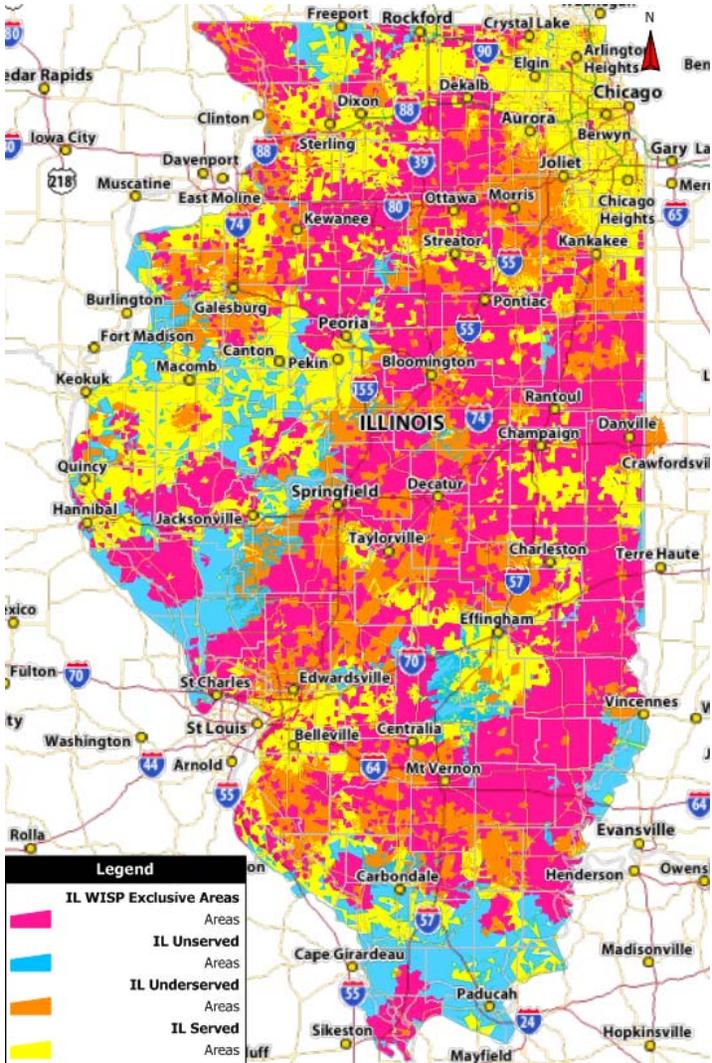
What is a WISP?

- Typically . . .
 - Based in rural communities and small towns with little or no choice of broadband provider
 - Community and customer focused
 - A few hundred to several thousand customers per WISP
 - WISPs serve approximately 3,000,000 total customers
 - WISPs primarily use unlicensed 900 MHz, 2.4 GHz and 5 GHz bands and “lightly licensed” 3650 MHz band. Some provide VoIP.
 - Most do **not** rely on federal subsidies

Where WISPs Are



Exclusive WISP-Served Areas



Why We Succeed

- Unlicensed spectrum lowers costs for lower density rural providers and enables rapid deployment
- Availability of affordable, high-bandwidth equipment enables growth
- Ability to manage growth by targeting demand with scaleable bandwidth equipment
- We help each other (industry support system)
- Creativity, innovation and the entrepreneurial urge

Current Challenges

- Government subsidization of competitors
- Unlevel playing field
 - Example: USF burdens, but no benefits
- Limited access to middle-mile facilities
- Network congestion, capacity constraints and increased “noise”
- Increasing demand for more and more customer bandwidth
- Limited access to additional spectrum

Universal Service Reform

- Prevent telco subsidies where WISPs already provide broadband service (but may not provide voice service)
 - Change definition of “unsubsidized competitor”
 - Maintain National Broadband Map as definitive source to determine location of “unserved” areas

Universal Service Reform

- Reject proposals that would require standalone broadband providers to contribute to USF
 - Statutorily prohibited
 - Not consistent with public interest
 - Otherwise, adopt exemptions or limit contribution base to telecommunications portion of network

Universal Service Reform

- Support “self-provisioning” condition on CAF recipients to enable WISPs and others to interconnect
- Support standalone WISPs’ ability to obtain subsidies if statutorily permissible
 - Nationwide ETC process
 - Remote Areas Fund Support standalone WISPs’ ability to obtain subsidies if statutorily permissible

Thank You.

Where There is a WISP,
There is a Way

