Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of	)	
	)	
Connect America Fund	)	WC Docket No. 10-90
	)	
High-Cost Universal Service Support	)	WC Docket No. 05-337

REPLY COMMENTS OF
THE WIRELESS INTERNET SERVICE PROVIDERS ASSOCIATION

The Wireless Internet Service Providers Association ("WISPA") submits these Reply Comments in support of the Comments filed by ViaSat, Inc. ("ViaSat") in the above-referenced proceedings.[1]

As providers of *unsubsidized* fixed wireless broadband service – often in rural, unserved and underserved areas of the country – wireless Internet service providers ("WISPs") have a track record of efficiency in delivering service to the public. WISPs often provide service where price cap carriers have chosen either to not provide service or to wait until the Universal Service Fund provides them with financial support. Regardless of the reason, WISPs continue to expand their fixed wireless networks to serve more and more consumers, without the benefit of federal subsidies.

WISPA agrees with ViaSat that, if the Commission continues to favor price cap carriers in Phase II of the Connect America fund ("CAF"), the cost model should be "based on the most efficient broadband technologies available in a given local market – including satellite and wireless broadband technologies – and not artificially limiting the

[1] *See* Public Notice, "*Wireline Competition Bureau Seeks Comment on Model Design and Data Inputs for Phase II of the Connect America Fund*," DA 12-911, WC Docket Nos. 10-90 and 05-337, rel. June 8, 2012 ("*Public Notice*"). *See* Comments of ViaSat, Inc., WC Docket Nos. 10-90 and 05-337, filed July 9, 2012 ("ViaSat Comments").

model to 'wired' technologies."[2] As ViaSat points out, a carrier could choose whatever technology it wanted, but support should match the most efficient technology, not the least efficient technology. Under ViaSat's model, the carrier would have the incentive to keep costs at or near the lowest efficiency level established for the market, be it wireless, wireline or satellite. This would reduce waste – or at least reduce subsidized waste – and decrease the potential for windfall where a carrier is funded pursuant to a wireline model but actually deploys on a less costly fixed wireless network. For these reasons, WISPA supports ViaSat's proposal.

WISPA also supports ViaSat's position that the cost model for the Remote Areas Fund ("RAF") should not be based solely on the CAF Phase II model.[3] In remote areas, the cost difference between a wireline model and a model based on the most efficient technology will be even more significant. The cost model for the RAF should be set at a relatively low level so as to maximize the benefit and the use of these alternative technologies.

[2] ViaSat Comments at 2-3 (footnote omitted).

[3] *See id.* at 5.

WISPA looks forward to working with the Commission as it considers cost models for CAF Phase II and the RAF. In both cases, WISPA believes that the cost basis should reflect efficient technologies, not wireline technologies that will unnecessarily drive up support levels.

Respectfully submitted,

July 23, 2012

WIRELESS INTERNET SERVICE PROVIDERS ASSOCIATION

By *_/s/ Elizabeth Bowles, President_*
/s/ Jack Unger, Chair of FCC Committee

Stephen E. Coran
Rini Coran, PC
1140 19th Street, NW, Suite 600
Washington, DC 20036
(202) 463-4310
Counsel to the Wireless Internet Service Providers Association