



December 21, 2012

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: WT Docket No. 11-49

Ms. Dortch

I am the president of Intelliwave LLC. Intelliwave is a wireless Internet service provider (WISP) headquartered in Athens, Ohio. Intelliwave utilizes the unlicensed portion of the 900MHz spectrum to provide fixed wireless broadband access to over 500 subscribers in 4 counties in Appalachian Southeastern Ohio. Intelliwave uses both Motorola Canopy and Waverider 900MHz equipment. Appalachian Ohio is characterized by heavily forested, steeply rolling terrain. The combination of trees and terrain render all other unlicensed band unusable for the point to multipoint capabilities required to provide last mile services to our customers. We can only reach these subscribers using the currently available 900MHz spectrum. Simply put, should Intelliwave lose the capability to continue to use this spectrum we would have no other option but to abandon these rural subscribers.

I am familiar with the joint test report prepared by Progeny and WISPA. The test results indicate that both the B and C blocks of Progeny's proposed spectrum will significantly and negatively impact the upper half of the band.

Intelliwave has numerous 900MHz access points deployed on towers located on the highest points in the counties we serve. Many of our access points are mounted over 300 feet above ground. One deployment is located 750 feet above ground. We are forced to mount our equipment this high just to be able to propagate signal down into the deep hollows that are home to our customers. Because our towers and equipment are deployed at such high elevation we are able to receive interfering signals from great distances. This in turn requires us to manage spectrum very judiciously. At some locations we have no options to switch to other channels should interference arise.

Progeny's pending network operation will cause an unacceptable level of interference with Intellwave's network. This interference will cause reductions in both service reliability and throughput. Additionally, the loss of channel use will severely limit the number of base stations that we can continue to operate. This situation will be further exacerbated should Progeny be permitted to deploy an unlimited and unknown number of base station transmitters in the future. This unacceptable interference and loss of channel capacity will cause Intellwave to be unable to continue to serve our hundreds of customers. This will severely impact the affected customers and will cause significant financial harm to Intellwave's business.

On behalf of over 500 rural broadband subscribers, I ask the Commission to DENY APPROVAL for Progeny to operate its licensed networks inside the 902-928 MHz band.

Regards,

A handwritten signature in blue ink, appearing to read "Chris Cooper". The signature is fluid and cursive, with a large initial "C" and "C".

Chris Cooper
President
Intellwave LLC