Broadband Properties Corp.
8602 FrontGate Ln. Indianapolis, IN 46256

February 1, 2013

Ms. Marlene Dortch, Secretary
Federal Communications Commission
445 12th St.
Washington, D.C. 20554

Re: WT Docket No. 04-356

Dear Ms Dortch,

With regard to the above captioned Notice of Proposed Rulemaking for the Advanced Wireless Service H Block, Broadband Properties Corp would like to comment on the Service Area Size and the proposed implementation of an Economic Area ("EA") approach. We believe that an EA approach contradicts any notion that the rural areas will be better served or that it allows ample access by smaller businesses. An EA approach has the appearance of streamlining the process to benefit only the larger PCS licensees or the MSS licensees, when other licensees that are licensed on a Basic Trading Area ("BTA") or Cellular Market Area ("CMA") would find it very attractive to add 10MHz to their spectrum holdings and increase their ability to enhance service. Those same smaller service area licensees will be economically prohibited from entering an auction where they must buy large territories with only10MHz of bandwidth. All Economic Areas contain large urban populations. Providers to rural populations are not as likely to buy urban service areas. We, therefore, believe that a CMA approach to Service Area Size will better suit the needs of both rural and urban populations, and more fairly balances the playing field for smaller operators to more efficiently add needed spectrum. Further, a CMA approach will not impede the ability to aggregate spectrum into a larger footprint.

Finally, we would encourage the Commission to add the ability for small operators to receive a 35% designated entity discount. Smaller operators are not as well capitalized and serving the rural areas is more costly and carries higher risk than serving urban areas.

Respectfully Submitted,

Thomas P. Farrell, Pres.