



*Via ECFS*

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

RE: **Expression of Interest:** Technology Transitions; AT&T Petition to Launch a Proceeding Concerning the TDM-to-IP Transition; Connect America Fund; GN Docket Nos. 13-5, 12-353, WC Docket No. 10-90

Dear Ms. Dortch:

Blue Wireless hereby submits this non-binding Expression of Interest in response to the Commission's solicitation in the proceeding(s) referenced above for a rural broadband experiment to provide broadband service in excess of 5 Mbps using unlicensed spectrum in tandem with LTE technology on licensed spectrum to serve rural consumers that otherwise lack access to high-speed broadband.

Blue Wireless is primarily a CMRS carrier serving rural areas in New York and Pennsylvania, and has been researching options to serve the underserved rural households within its licensed territories. Blue Wireless therefore was heartened by the Commission's call to the telecommunications industry to serve the underserved homes of our nation. We applaud the Commission's efforts and stand ready to provide the technical, financial, and practical feedback for the Commission and industry to utilize the findings of our experiments to help determine the most appropriate infrastructure to bridge the digital divide for so many rural residents. We believe that by employing traditional scientific methods we will clarify, quantify, and qualify the best alternative approaches to serving this constituency with true broadband services based upon a multivariate model.

Blue Wireless proposes an experiment to test the feasibility of providing high-speed broadband services in excess of 5 Mbps, and in many cases, in excess of 20 Mbps, using unlicensed spectrum (including the TV whitespace in the 500 – 600 MHz frequencies alone or in conjunction with the ISM unlicensed bands at 2.4 GHz and 5.8 GHz), LTE technology using our licensed 1.9 GHz spectrum, fiber, fiber-hybrid-coax, and bonded copper solutions. The experiment would build on Blue Wireless's experience in working with municipalities to provide free WiFi in public spaces in urban areas, to test the feasibility of larger-scale WiFi deployments in rural areas – particularly using unlicensed frequencies in the TV white spaces bands, with their superior propagation characteristics. Blue Wireless would offer consumers tiered pricing comparable to pricing that is available for comparable high-speed broadband offerings in urban/suburban areas.

Blue Wireless is a licensed CMRS provider that has been offering facilities-based wireless services to customers in upstate New York and western Pennsylvania for approximately ten years. Like many companies serving rural areas, we believe that wireless can be the least costly means of serving rural areas and that such service can also be cost-effective for consumers, but at this stage it remains a hypothesis. By creating experiments that use truly diverse ways to reach the same goal, will we be able to conduct a true experiment to test the validity of this hypothesis.

Blue Wireless has the resources and expertise both to deploy and to critically assess these experiments. We have diverse, multi-gigabit Ethernet connections using our fiber network, in addition to our licensed and unlicensed spectrum initiatives. We have retail locations already established in proximity to the rural areas where the experiments would take place. We already offer 2G and 3G data services to consumers and are in the process of deploying 4G (LTE) service. The company has been in operation for 10+ years, and the management team collectively has decades of experience in both wireline and wireless communications at large Fortune 50 companies and small rural ILECs.<sup>1</sup>

With appropriate funding support provided by the Commission, we believe the combination of our expertise, intrinsic assets, and the commitment to providing low cost alternatives to the most digitally challenged in our society unequivocally qualifies Blue Wireless as a superior alternative to move forward with the Commission's experiment initiative. We commit to share our results so all carriers may be successful in bringing broadband to their individual communities. Moreover, should the Commission fund additional experiments, we ask the Commission to require all participants in this experiment similarly to use traditional scientific methods, publish a complete history and results of their work and findings, and be responsive to inquiries via a public forum.

Please contact me at [716-605-1237](tel:716-605-1237) or via email at [bgelfand@blueunlimited.com](mailto:bgelfand@blueunlimited.com) if you have any questions or need more information about this Expression of Interest.

Respectfully submitted,

Brian Gelfand

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<sup>1</sup> Blue Wireless has petitions pending for designation as a Lifeline-only eligible telecommunications carrier (ETC) in New York (before this Commission) and in Pennsylvania (before the Pennsylvania Public Utilities Commission). Once designated as a Lifeline ETC, Blue Wireless also will be able to leverage the rural broadband experiments to extend facilities-based Lifeline service to more rural consumers.