

These Comments are filed in support of the Petition filed by Mimosa Networks, Inc. urging the Commission to initiate a rule making proceeding to make spectrum in the 10.0-10.5 GHz band available for wireless broadband services.

I am an electrical engineer and a serial entrepreneur. My fourth startup company, netBlazr Inc. founded in 2010, is a fixed wireless Internet Service Provider leveraging license-exempt spectrum to deliver broadband Internet services in dense urban areas. We are also developing a new form of wireless mesh network node under a Phase II SBIR grant from the National Science Foundation. The proposal by Mimosa Networks would be of direct benefit to companies like netBlazr as we seek to make high speed Internet connections available to the many US citizens that are under-served by the monopoly telephone and cable companies.

There are multiple reasons to support initiating a rule making proceeding. First, spectrum suitable for wireless broadband is in short supply, while the use of wireless broadband continues to accelerate and expand. The mobile industry has been most vocal about the need for more airwaves for mobile broadband, but the primary path for handling increased mobile data demand is to leverage Wi-Fi technology and the license-exempt spectrum that has fostered the tremendous success of Wi-Fi. Precisely for that reason, the Commission should be diligent in seeking new ways to open up spectrum for license-exempt and lite-licensed purposes. Such spectrum promises a greater long term benefit for high speed Internet access than additional licensed spectrum for LTE.

Second, the specific approach proposed by Mimosa warrants consideration in a rule making proceeding. As Mimosa explains in its Petition, several factors support opening up the 10.0-10.5 GHz band on a shared basis for broadband services, enabling wireless broadband service providers to use the spectrum for long-distance, high-capacity links. For example, attenuation due to rain or water vapor is only a minor issue in this band.

While Mimosa notes that interference issues would need to be addressed because the band is currently allocated for radar operations and for amateur radio use, a rule making proceeding will provide an effective forum for exploring these issues and working out solutions. Both band sharing and the concept of secondary users are well established spectrum management policies, so the presence of interference issues should not serve as a bar to the Commission initiating a rule making.

And, third, consumers (especially those in rural areas) and wireless Internet service providers (WISPs) would benefit from making the 10.0-10.5 GHz band available for broadband services. WISPs serve more than 3 million customers, many of whom live in rural areas where access to wired broadband is limited or non-existent. Making more spectrum available for the delivery of broadband will benefit consumers by giving them access to competitive services.