



WASHINGTON, DC

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May 2, 2014

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

Re: *Technology Transitions*, GN Docket No. 13-5

*AT&T Petition to Launch a Proceeding Concerning the TDM-to-IP Transition*,  
GN Docket No. 12-353

*Connect America Fund*, WC Docket No 10-90

*Structure and Practices of the Video Relay Service Program*, CG Docket No. 10-51

*Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*, CG Docket No. 03-123

*Numbering Policies for Modern Communications*, WC Docket No. 13-97

Notice of Oral Ex Parte Presentation

Dear Ms. Dortch:

On May 1, 2014, representatives of the Wireless Internet Service Providers Association (“WISPA”) met with Jonathan Chambers, Chief of the Office of Strategic Planning & Policy Analysis, to discuss issues related to the proposed rural broadband experiment program. In addition to undersigned counsel, the WISPA representatives included Elizabeth Bowles, Chuck Hogg, Alex Phillips and Richard Harnish.

The WISPA representatives reviewed the attached presentation, which outlines the views that WISPA articulated in its Comments<sup>1</sup> and Reply Comments<sup>2</sup> regarding the proposed rural broadband experiment program. The WISPA representatives stated that a number of WISPA members are currently deploying hybrid fiber-wireless networks in order to provide fixed broadband services. WISPA emphasized that the record and “expressions of interest” support a

<sup>1</sup> WISPA Comments, GN Docket No. 13-5, *et al.* (filed Mar. 31, 2014).

<sup>2</sup> WISPA Reply Comments, GN Docket No. 13-5, *et al.* (filed Apr. 14, 2014).

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budget larger than the \$50-100 million proposed by the Commission, and that cost-effectiveness should be the primary criterion for selecting projects to fund.

Pursuant to Section 1.1206 of the Commission's Rules, this letter is being filed electronically via the Electronic Comment Filing System in the above-referenced proceedings.

Respectfully submitted,



Stephen E. Coran

*Counsel to the Wireless Internet Service  
Providers Association*

Enclosure

cc: Jonathan Chambers

# Rural Broadband Experiments

May 1, 2014

[www.wispa.org](http://www.wispa.org)



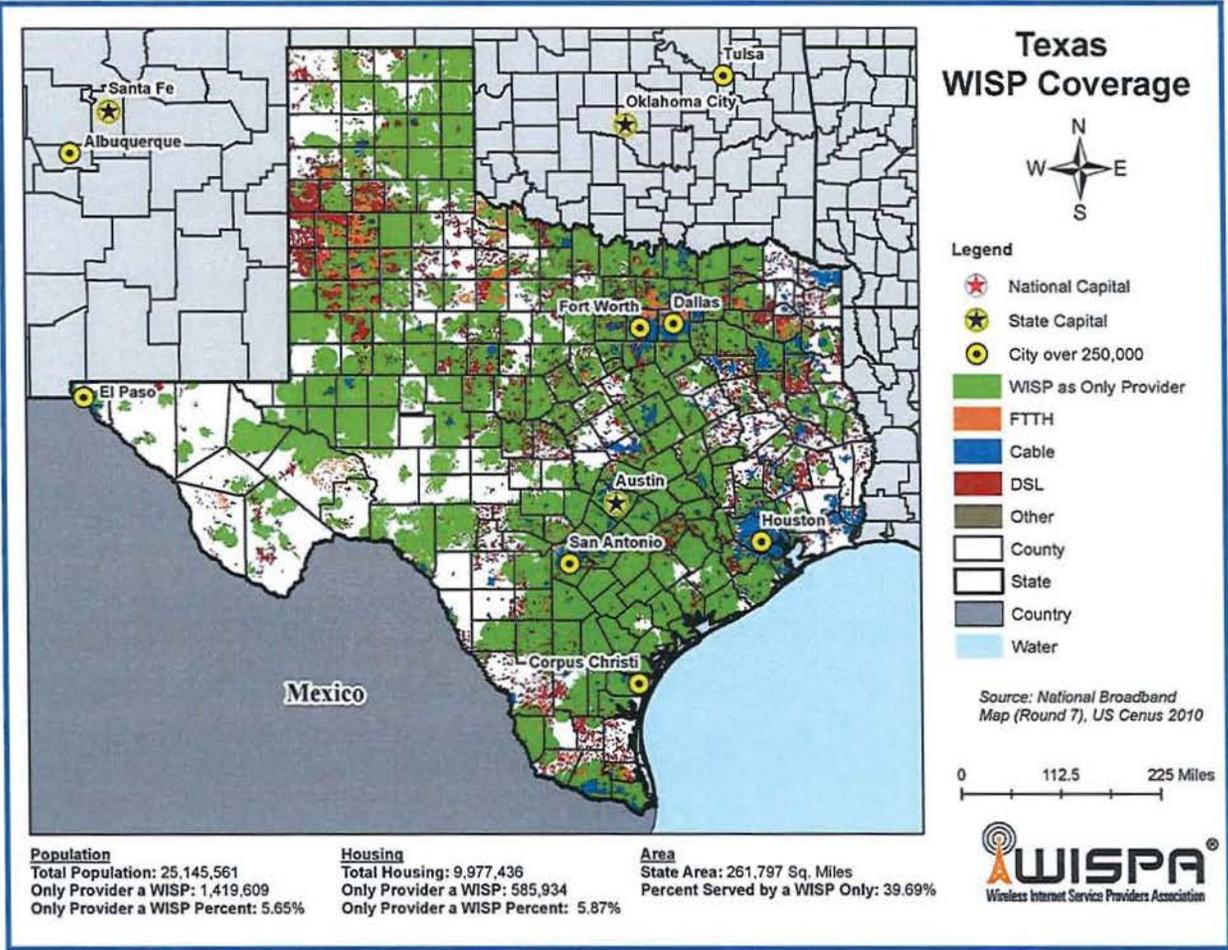
# About WISPA

- Founded in 2004 by small group of WISPs
- Today
  - 800 members . . . and growing
  - Two annual trade shows
  - Increasing commitment to advocacy and member services

# What is a WISP?

- Typically . . .
  - Based in rural communities and small towns with little or no choice of broadband provider
  - Community and customer focused
  - A few hundred to several thousand customers per WISP
- WISPs serve approximately 3,000,000 total customers
- WISPs primarily use cost-effective unlicensed 900 MHz, 2.4 GHz and 5 GHz bands and “lightly licensed” 3650 MHz band
- **Most do *not* rely on federal USF/CAF subsidies**

# Exclusive WISP Areas



# WISPs and USF

- Standalone broadband providers are *not* providers of “telecommunications services”
  - Most are not ETCs and are ineligible for USF support
- Many WISPs have begun offering interconnected VoIP
  - VoIP quality is based on network design, not technology platform
- WISPs have suffered under a system that funds competitors that use USF support to subsidize broadband

# Rural Broadband Experiments

- FCC should have as large a budget as possible to fund experiments
  - “Astounding” demand in 1,000+ expressions of interest
  - Even \$200 million is far less than annual CAF budget
  - More money means more experiments means more data to inform regulations and policy going forward
- No priority for rural LECs or any other technology or classification
  - Level playing field will promote participation and competition for program funding
- Selection criteria for fixed wireless projects
  - Primary criterion should be cost-effectiveness
  - Also consider experience in developing fixed wireless networks

# Rural Broadband Experiments

- ETC process should be streamlined
  - Supports FCC proposal for post-selection ETC designation process
    - 30 days to file with State
    - 60 days for State to approve, deemed granted if no decision
    - No involuntary service obligations (e.g., Lifeline)
  - ETC designations should be limited to the specific area, the time period of the funding and the specific program (e.g., rural broadband experiment, CAF Phase II competitive bidding and Remote Areas Fund)
  - Benefits
    - Greater participation, which will increase quality of proposals and competition for funding
    - Promotes efficiency by requiring ETC designation only for selected companies for the scope of the projects
    - ETC obligations fairly limited to duration of funding