

Zeecon Wireless Internet, LLC  
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June 11<sup>th</sup>, 2014

*Via ECFS*

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 Twelfth Street, S.W.  
Washington, D.C. 20554

*Re: Revision of Part 15 of the Commission's Rules to Permit Unlicensed National Information Infrastructure (U-NII) Devices in the 5 GHz Band, ET Docket No. 13-49  
Comments in Support of Petition for Reconsideration of Cambium Networks, Ltd.*

**Zeecon** files these comments in support of the Petition for Reconsideration filed by Cambium Networks, Ltd. in the above-referenced proceeding. Cambium's Petition urges the Federal Communications Commission to retain the Section 15.247 GHz out-of-band emissions ("OOBE") limit for the 5.725-5.850 GHz band. In the First R&O, the FCC voted to replace this OOBE limit with the much more restrictive limits in Section 15.407.

**Zeecon** is a wireless Internet Service Provider ("WISP"), and we provide broadband Internet access services to approximately 2000 customers in rural and insular areas in the state of Texas. We join Cambium and others in urging the FCC to retain the existing Section 15.247 OOBE limit to preserve our company's ability to deploy longer-range wireless links for broadband access, backhaul and other uses. We rely operate **37** longer-range wireless links in the 5.725-5.825 GHz band to provide services, with link distances of up to **20** miles. The availability of cost-effective, point-to-multipoint equipment is vital to our continued ability to provide broadband services to customers in these areas. Unless the FCC grants Cambium's petition, it will no longer be economically feasible for our company to fill new service requests from rural residents or businesses.

**Zeecon** respectfully requests that the FCC grant Cambium's Petition for Reconsideration for these reasons as well as those set forth in the Petition.

Respectfully submitted,

By: Ty Featherling

Title: **Systems and Support Manager**