

July 9, 2014

Marlene H. Dortch, Secretary  
444 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 WISPA, Cambium, Mimosa Networks and JAB.*

Dear Ms. Dortch,

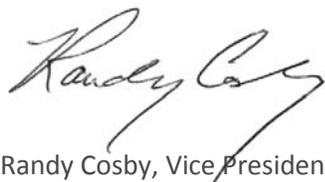
InfoWest, Inc. ("InfoWest") is filing these comments in support of the Petition for Reconsideration filed by Cambium Networks, Ltd. In the above-referenced proceeding. Cambium's petition urges the FCC to retain the Section 15.247 GHz out-of-band emissions limit for 5725-5850 GHz band. In the first R&O, the FCC voted to replace this OOB limit with much more restrictive limits in Section 15.407. The proposed change will be detrimental to our subscribers, our company and to industry innovation as a whole.

InfoWest is an internet service provider operating in Southern Utah, Southeast Nevada and Northwest Arizona. We rely heavily on the availability of 5GHz spectrum discussed in ET Docket No. 13-49 to provide internet service to thousands of customers in rural and suburban areas. In many areas fiber, cable and DSL internet services are not available or do not meet the proposed minimum standards for broadband. As WISPA, Cambium, Mimosa Networks and JAB have illustrated, the restrictive OOB limits in section 15.407 will make it impossible for us to continue to provide affordable, high performance broadband service in many of these areas, and will not improve efficient use of the 5GHz band.

The market demand for affordable 5GHz PTMP fixed wireless broadband services has spurred innovation among manufacturers. This innovation has kept pace with growing broadband needs in rural areas. Planned and announced technological developments allowed under the section 15.247 rules promise to even better manage interference and unwanted emissions in order to keep up with usage and bandwidth demand. If Section 15.407 replaces the Section 15.247 rules, increased equipment costs, distance limitations and limited frequency availability will severely limit (and likely eliminate) wireless broadband in rural service areas. This in turn will severely curtail future innovation and improvements that would accomplish much more to improve efficient use of the band than Section 15.247 could.

InfoWest joins with the petitioners to encourage the FCC to retain Section 15.247 rules in lieu of the new Section 15.407.

Sincerely,



Randy Cosby, Vice President

