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July 23, 2014

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*

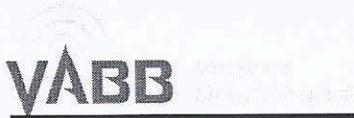
Comments in Support of Petition for Reconsideration of WISPA, Cambium, Mimosa Networks and JAB

Dear Ms. Dortch,

Virginia Broadband, LLC (DBA VABB) is a full-scale, fixed wireless Internet service provider utilizing the unlicensed frequencies 900MHz, 5GHz, and 2.4GHz in un-served and underserved rural areas of Central and Eastern Virginia. VABB 's customer base and coverage area comprises 1,500 customers in 17 counties south of Washington, DC, with some counties considered "bedroom" communities of the Washington DC metropolitan area and home to thousands of federal employees and citizens who enjoy the benefits of rural living, albeit, at the expense of sacrificing sufficient high-speed Internet access to conduct personal and professional business. Our goal is to close the Internet gap in this region by providing a robust broadband service equivalent to what urban and suburban citizens enjoy. Fixed wireless service is that solution.

With all due respect to the WISP entities that have filed a PETITION FOR PARTIAL RECONSIDERATION OF SECTION 15.4097 (JAB, Cambium, Mimosa, WISPA, and many others to come) citing financial hardship, manufacturing impact, and rural propagation diminishment concerns that this new ruling will have on the WISP industry's respective interests, Virginia Broadband is of the belief that these financial concerns are just one part of the overall conversation.

Virginia Broadband overwhelmingly supports the findings that illustrate the financial and technical impact these sweeping changes to the 5725-5850 MHz band will cause to their organization and ours, however, there are other factors the FCC should consider in determining the fate of this particular frequency band as well as the multitude of bands currently under review by the FCC. The most obvious factor is the fact that millions of citizens throughout this nation have little to no access to robust, high-speed Internet – a service that IS and CAN continue to be provided through the current SECTION 15.247 ruling. While terrestrial wireless technology



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cannot possibly reach every single corner of every rural area, for the past 20 years this industry has flourished and has become a viable sector of our nation's economy, serving hundreds of customers in remote areas with names like "Lost Valley" and "Graves Mountain" in Madison, VA. It is no secret that the wired and cellular providers simply do not see the financial benefit of building their infrastructure into rural, remote areas. Terrestrial wireless technology however has proven its ability to serve these rural areas efficiently, effectively, and with substantially less cost.

To that end, this is the perfect opportunity for the FCC to clear a path for growth of the WISP industry by keeping the SECTION 15.247 intact and forging a bold new plan to establish frequency bands conducive to a WISP's ability to penetrate foliage better, cover wider areas, and to allow long-distance point-to-point and point-to-multipoint distribution channels. It's understandable that after a century-long governmental tradition of dividing radio spectrum based on whatever the "present" technology required; i.e. radar, satellite, public safety, the emerging drone technology, etc... it's proving to be a monumental task for the FCC to re-slice and re-define spectrum to accommodate these older uses while envisioning future use. However, the WISP community is not going away, it is getting stronger by proving the viability of their service. It would behoove the FCC's Commissioners to find ways to help, not hinder the WISP sector's ability to achieve greater rural access to the Internet, thereby growing our economy.

As for WISPs across this nation - while many are small, private firms providing a valuable service to their rural communities, there is a movement afoot to unite and aggregate this industry through acquisition and infrastructure build-out to enhance, enrich, and contribute to this Nation's economic strengths through the medium of terrestrial wireless Internet service. By providing this service, citizens and businesses have access to an "Internet tool" that helps grow businesses and aids in the progress of education and healthcare. WISP Internet services generates millions of dollars in tax revenues, wage earnings, and a host of other factors beneficial to this Nation's economy. By throttling the WISPs technical abilities through more stringent regulations sited in SECTION 15.4097, the FCC is not fully grasping the impact such rulings have - not just to the providers, manufacturers, or citizens, but to the overall growth and strength of this Nation.

As federal/state/local elected legislators and FCC Commissioners come and go over the past two decades, one theme remains consistent in their pledge to their constituents - bridging the Internet gap in rural America. In a recent conversation with our Virginia State Delegate regarding ongoing state-level discussions on how to provide Internet service in all corners of this fine Commonwealth, his comment rings hauntingly true,

"... we've had this conversation 10 years ago, 5 years ago, 2 years ago, and here we are again today discussing ways to find a solution but no one is stepping up to solve it."

The WISP community is standing up to the challenge! And the FCC should also stand up and support a unified frequency band policy that will facilitate the pledge our elected officials (and your superiors) have communicated to their constituents.

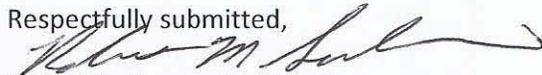
We would like to leave you with one final quote we constantly hear from citizens, businesses, and even federal employees (those required to telecommute as part of their federal jobs). When they call Virginia Broadband asking for Internet service at their homes or businesses, only to find out we cannot provide the service due to technical/terrestrial limitations, they reply,

"... I can't believe I live 60 minutes from the Nation's Capital and I can't get high-speed Internet!"

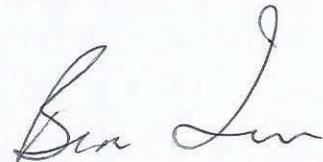
Virginia Broadband and the many WISPs nation-wide stand ready to serve these people, but we can't do so if there's uncertainty about the fate of the 5725-5850 MHz band – the backbone of our networks... not to mention the "to be determined" speculations surrounding the fate of the White Space spectrum and the convoluted rules proposed in auctioning off some of the spectrum....maybe!

In conclusion, give WISPs the spectrum tools needed and a clear directive to the manufacturers so they can plan and supply the lowest cost equipment through mass production and industry adoption. As an industry, we will thrive and serve our rural communities, fulfil the promise of our elected officials, enhance millions of lives, add revenue to our economy, and catch-up with the rest of the "Wireless World".

Respectfully submitted,



Robert Sullivan – President



Brad Truman – Director of Operation



Joseph Lenig - Director of Sales and Marketing
