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July 27th, 2014

Via ECFS
Malene 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.

Amplex Electric supports the Petition for Reconsideration filed by Cambium Networks, Ltd. in the above referenced proceeding.

Amplex provides broadband Internet to ~4000 businesses and households in Northwest Ohio. The majority (85%) of our access point to customer connections are currently using Cambium equipment in the U-NII 5725-5850Mhz frequency band. Amplex uses this band extensively as it provides both sufficient power and channel width to reliably provide broadband connections up to 12 miles from the access point. A large percentage of our customers are 4-6 miles from the serving access point.

Cambium has stated that there will be significant cost increases due to additional filtering requirements, a reduction in channel size to 5Mhz (from 20Mhz), and a reduction in output power as a result in the OOB emissions limits. Should the FCC fail to restore the previous OOB limits in the 5.7 frequency band we expect that we will be unable to provide broadband service to a very significant portion of our existing customers. This result would be completely opposite the FCC's current policy of encouraging broadband competition and availability.

The FCC's stated reason for the change to the OOB limit is to protect TDWR radar installations from interference. Given that the FCC's own record shows NO prior interference from legally operating U-NII equipment, the FCC and the industry have taken substantial steps to eliminate TDWR interference, and the significant harm to consumers that will result due to this unnecessary rule change, the FCC should restore the prior OOB emission rules.

Sincerely,
Mark Radabaugh
Mark R Radabaugh
President, Amplex