



July 30, 2014

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

Re: Revision of Part 15 of the Commissions 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,

Thank you very much for your attention to this very important matter. PEAK Internet operates an ISP in the Willamette Valley in Oregon that provides high-speed Internet service using fiber, DSL and wireless technologies.

It is our understanding that FCC Order of April 1 preserved unlimited gain antennas for point-to-point use in 5725-5850 MHz band, but eliminated ability of devices to continue to be certified under Section 15.247. After two years, no more Section 15.247 equipment will be sold. All new equipment must be certified under Section 15.407.

It is also our understanding that petitions for reconsideration were filed on June 2, 2014 by WISPA, Cambium Networks, Mimosa Networks and JAB Wireless.

We hope that you understand that almost all WISPs (and other industries as well) use Section 15.247 equipment in this band for long-distance point-to-point backhaul and most also use the band for point-to-multipoint communications (that includes a point-to-point uplink) to deliver broadband to distant end-users in rural areas.

We are deeply concerned that the proposed changes by the FCC will make it impossible for us and other WISPs to provide high quality, reliable Internet service. This should be especially alarming since we are the only broadband Internet service available in many rural areas.

The proposed rule changes will drastically increase our costs (and costs to customers), while substantially reducing the amount of spectrum available for serving customers.

We urge you to reconsider this rule change. With new security features, encroachment on non licensed bands has been largely mitigated. There is no good reason to further restrict use of this workhorse band by implementing filters and power restrictions that both increase costs and decrease usability.

Eliminating the flexibility to allow devices to continue to be certified under Section 15.247 was entirely unnecessary and will significantly harm ability of many rural WISP customers to continue to receive broadband and voice services

Respectfully,

David Placko, Director of Engineering
PEAK Internet, LLC
1600 SW Western Blvd, Suite 180
Corvallis, OR 97333

david.placko@peakinternet.com
peakinternet.com