



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 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,

We are writing to comment on changes made to Section 15.407. We understand the FCC's direction with keeping tighter out-of-band emission requirements for the 5.8 GHz band. However we feel the imposed restrictions will be detrimental to our business operations.

We serve parts of Montgomery, Audrain, Callaway, Warren & Lincoln Counties in Missouri. We rely on the 5.8 GHz band to provide the needed bandwidth to approximately 250 customers by way of 12 towers across our coverage area. Since we focus on unserved and underserved areas, nearly all of these residences and businesses have no other choices except satellite and mobile broadband. Because of high latency and low data usage caps, these are poor choices for these customers. We offer 3 Residential and 3 Commercial Speed tiers, our most popular is 3 Mbps/1 Mbps (down/up), and offer tiers up to 10 Mbps/10 Mbps.

The changes being made to U-NII-3 to reduce the out-of-band emissions may seem like a very sensible step. But the limitations that it places on reducing upper and lower channels will reduce the services that we are able to provide. As a Wireless Internet Provider in a very rural area this will only impede and reduce our ability to provide service to our customers. Because of these changes, we will have to implement licensed spectrum to replace at least 8 of our present 5.8 GHz backhauls. As we average around 15 customers for each of the towers in question, it would be very uneconomical to install an \$11,000-\$13,000 link to provide backhaul for these customers. We feel we would have no other choice but to discontinue service to these customers, which we hope is not the goal of the FCC with this decision. Because of the fixed expenses we incur each month in order to provide services to our customer base, losing ~120 customers could cause us to cease operations.

In summary, if the new rules stand as currently written, we expect the following impact:

- Less usable spectrum due to out of band emission requirements
- Equipment costs rising to unaffordable levels
- Reduced distance due to lower gain antennas and filters
- Wireless ISP's going out of business and rural customers losing broadband access

Regards,

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