



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

July 31, 2014

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,

Thank you very much for your attention to this very important matter. I would like to voice my concern that eliminating allowance for equipment **in the 5725-5850 MHz band** to be certified under Section 15.247 was entirely unnecessary and will significantly harm our business.

I think that WISPA, Cambium, Ubiquiti and others in their petitions have articulated the case why certification to Section 15.407 was unnecessary so I just confer my support of those petitions.

My main emphasis is that our wireless internet business will be harmed by the increase in costs, lack of bandwidth and decreased link distances. Our primary services are to the rural areas without adequate internet. Consequently, our rural customers will be harmed by poorer service and higher prices.

The 5725-5850 MHz band is the only unlicensed band capable of delivering long distance backhaul with considerable speeds over long distances and at reasonable prices. Hence, this band is our workhorse. We project that certification under Section 15.407 will increase our prices for backhaul equipment, require more use of licensed bands at a considerably higher cost, and decrease the available bandwidth to our customers at time when demand for speed is exploding.



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It is difficult to put a number on this harm, but consider that we have more than 50 links utilizing the 5.8GHz band and most of these links are at capacity. Additionally, 12 new links are planned in the next 12 months. If we lose channel size or link distances, it means we will have to deploy new equipment which means increased tower expenses and possibly new tower sites.

I estimate this expense could cost us up to \$250,000 if we have to reconfigure existing links. This does not take into consideration any costs we may incur from lease rent increases, new load studies, new sites and shorter links. These would incur exponential increases especially if we have to deploy and / or build new sites. This is a significant cost based on the size of our business.

Please salvage the 5.8GHz band and reconsider allowing certification under section 15.247.

Regards,

A handwritten signature in black ink that reads 'Phil Lambert'. The signature is written in a cursive, flowing style.

Phil Lambert
General Manager
Q-Wireless, LLC

Attachment: Appendix – Funding Proposal



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