



Eastside Marketplace
P.O. Box 9587
Moscow, Idaho 83843
208-882-8869

August 13, 2014

Via ECFS
Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
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 Petitions for Reconsideration*

First Step Internet, LLC ("FSI") files these comments in support of the Petitions for Reconsideration filed by petitioners such as the Wireless Internet Service Providers Association, Cambium Networks, Ltd., JAB Broadband in the above-referenced proceeding. These petitioners and many others ask the Federal Communications Commission ("FCC") to retain the Section 15.247 GHz out-of-band emissions ("OOBE") limit for the 5.725-5.850 GHz band. In the First Report and Order in this proceeding, the FCC voted to replace this OOBE limit with the much more restrictive limits in Section 15.407. This decision will negatively impact FSI's ability to deliver services to rural areas.

FSI is a facilities-based, regional Internet Service Provider that has been providing Internet access services since 1994. FSI began by offering dial-up Internet access, but FSI's services have evolved to include fixed broadband Internet access services to customers in eastern Washington and in north/central Idaho. These fixed terrestrial broadband services include dial up, DSL, fiber, cable Internet and fixed wireless broadband services. FSI has an extensive wireless network of point-to-point links, and some parts of the network are used for backhauling data over unlicensed frequencies in the 5.725-5.825 GHz band. In comments submitted earlier in this



proceeding, FSI expressed concern about possible rule changes that could burden this network.

We join the Petitioners and others in urging the FCC to retain the existing Section 15.247 OOB limit to preserve our company's ability to deploy longer-range wireless links for uses such as broadband access and backhaul. FSI operates approximately 40 longer-range wireless links in the 5.725-5.825 GHz band to provide services, with link distances of up to 35 miles. The availability of cost-effective, point-to-multipoint equipment is vital to our continued ability to provide broadband services to customers in these areas. Unless the FCC reconsiders the new OOB limit, it will no longer be economically feasible for our company to fill new service requests from rural residents or businesses. In many cases, the expected doubling (or more) of equipment costs would render the provision of services to sites with a limited number of possible users uneconomical, resulting in a loss of service to potentially thousands of the most remote users, who can least afford to bear cost increases, and who have no other terrestrial means of accessing the Internet. In other cases, the reduced usable spectrum and consequent reduction of potential throughput renders 5.725-5.850 unusable for long-range backhaul, necessitating the use of significantly more expensive (both to acquire and to operate) part 101 licensed links. This increase in costs directly affects our ability to build out rapidly, and significantly raises the demand threshold for considering a build out. Due to this, many potential users will be left with no options other than satellite.

For these reasons, FSI respectfully requests that the FCC grant the petitions for reconsideration in this proceeding that advocate retaining the existing Section 15.247 OOB limit.

Respectfully submitted,

First Step Internet, LLC

By: 

Title: **President**