



101NETLINK

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**August 13, 2014**

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12<sup>th</sup> 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:

My company, 101Netlink, provides fixed wireless broadband service in very rural Humboldt, Mendocino and Trinity Counties, California. We rely primarily on unlicensed spectrum to deliver broadband services to consumers that have little to no broadband choices. My father and I built our network from scratch using devices authorized under Part 15 rules the FCC adopted to open up 900 MHz, 2.4 GHz and 5 GHz spectrum for unlicensed broadband devices. Thanks to the Commission's initiatives, consumers in much of the 3 counties listed above can now experience true broadband Internet access and digital phone service.

101Netlink is very concerned with the new rules that will majorly impact the way we provide broadband services to our rural communities. Currently, we utilize a lot of the 5.725-5.850 MHz equipment that operates under Section 15.247 rules. In two years, Section 15.247 equipment will no longer be legal to manufacture which will require all new equipment to be certified under Section 15.407. This has SEVERE ramifications for our rural business and economically strained region if the cost of Internet services are increased to deliver. Section 15.407 equipment will be much more expensive (will need expensive additional filters) and will operate on fewer channels (will have to stay away from the band edges). Since we are located in an area that has long ridges/valleys, we depend on long range point to point 5ghz backhaul links that would be impossible to use with the new restrictions.

Thank you for the opportunity to weigh in on this very critical decision for rural America. My family and I have lived in the “woods” for three generations and unlicensed wireless broadband technology has allowed us to be successful, supportive and a major community contributor in the beautiful but technology challenged regions of rural California.

We are seriously concerned about the negative impact this new change will make on delivering economic broadband services!

Sincerely,

**Seth  
Johannesen**

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