

Bertram Wireless  
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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, UBNT

Dear Ms. Dortch,

Our company, Bertram Wireless, provides fixed wireless broadband service in rural Wisconsin. We cover approximately 28,000 square miles of coverage area that is currently unserved or underserved by traditional telecom/communications companies. Within this coverage area, many thousands of homes are provided with Internet service that would otherwise have to rely on very expensive and data limited mobile Internet connections, utilize dialup services or have no Internet at all.

We utilize a variety of different unlicensed spectrum in order to deliver these services in the 900MHz, 2.4GHz and 5GHz spectrum. Thanks to the Part 15 rules the FCC adopted, it has been both technically and financially feasible for us to build and grow this network to continue to provide Internet service to rural families and businesses that none of the large operators are interested in helping.

We are extremely concerned about the new proposed rules under Section 15.407. Currently, we utilize a large amount of 5725-5850MHz equipment that legally operates under Section 15.247 rules. We also purchased over a million dollars worth of new PMP450 equipment from Cambium networks at the end of last year that operates under the Section 15.247 rules that we have begun deploying to homes across our coverage area.

The impact of the proposed 15.407 rules has severe ramifications for us, both financially and technically. Technically, it is already challenging for us to deliver service to end users using 5GHz. Our service area has many trees and elevation changes, and reducing our ability to utilize the currently legal 5GHz spectrum will make it even more difficult for us to utilize both 5GHz point to point backhauls and 5GHz point to multipoint equipment. This will mean a drastic reduction in the number of customers we are able to service and the speeds we are able to provide to them. At a time when people are relying even more heavily on the Internet for education, business and entertainment, this puts us in a very tough position.

Financially, having to deal with a recertification process and filter installation and/or replacement of existing equipment would be catastrophic. Just having to send technicians to all of our towers to modify equipment would be a severe financial burden. If we also had to perform any work on the equipment at a customer premise, there would be no financially feasible method of doing so. That would be increased dramatically if any equipment had to be replaced.

Already, this proposed rule is causing economic harm, as we have put a halt to our roll out of new 5GHz point to multipoint equipment until we understand the complete impact of this proposed ruling. That means less income for us, as we perform fewer installs, less revenue for Cambium networks as we have stopped purchasing their equipment and fewer jobs for our installers.

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I appreciate your consideration in this matter and I urge the FCC to reconsider this proposed ruling.

Sincerely,

Simon Westlake

Chief Technical Officer

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