



Wireless CKS Wireless, Inc.

High Speed  
Wireless  
Internet

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 5Ghz Band, ET Docket No. 13-49.

Comments in Support of Petition for Reconsideration of WISPA, Cambium Networks, Mimosa Networks, and JAB.

Dear Ms. Dortch,

CKS Wireless, Inc. provides High Speed Broadband Internet to the residents of rural and urban Cherokee County, Texas. Much of this High Speed connectivity is made possible by using the unlicensed frequencies in the U-NII 5Ghz bands. Our customers are made up of residential, commercial, and many governmental agencies that would not have access to these services without the above frequencies. CKS Wireless strongly agrees with WISPA, Cambium Networks, Mimosa Networks, and others in recommending that the commission retain the existing unwanted emission limits as described in Section 15.247.

If the more stringent limits of Section 15.407 are allowed to stand, the ability of CKS Wireless to deliver quality service to our more than 600 customers will be severely damaged. Many of our 600+ customers have no other access to High Speed Internet. CKS Wireless has invested several million dollars in our existing network and we will incur significant expense to re-tool the infrastructure to deal with this rule change. From my perspective, I see this change costing my company several hundreds of thousands of dollars in new tower leases and new radio equipment required to comply with this ruling. New tower sites, which will be required, will cost approximately \$100,000.00 per site. I have seen several estimates on the costs of the new equipment that will be required under this ruling and it appears that the costs will be, at least, double the current cost. In economic times like we are currently experiencing, new rulings and regulations should be helping us get Americans connected, not tying our hands and causing millions and millions of dollars in added costs.

Please help us support rural broadband and reverse this ruling.

Sincerely,

Jon P. Kelley

President

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