

WC Docket 14-93, Connect America Fund Phase II Challenge

- Essex Telecom, Inc. (d/b/a T6 Broadband) in Illinois:

Per the National Broadband Map data, Essex Telecom (T6), Inc. claims to offer voice service in 1,753 Census Blocks in Illinois Consolidated Telephone Company Serving Areas. The Holding Company for Essex Telecom (T6) , Inc. is JAB Wireless, Inc. which claims to have about 175,000 subscribers nationwide with about 20,000 VoIP subscribers.¹ This results in less than a 12% take rate for Voice Services over their entire footprint. On its website FAQ (included in Essex attachment) section T6 describes the Wireless Internet service and describes the “line of sight” requirements for such a service. Any trees, buildings, or hills, will impede service, so T6 cannot guarantee that it can unilaterally serve every customer in a given CB. Another FAQ on its website relates to number portability and the customer option to keep their current telephone number. Given this option, ICTC should expect some level of porting activity in the CBs and should see port outs to this company in its internal porting data. Based on the Company Porting data from 2012 through 2014 (y-t-d), ICTC has yet to see any porting activity to Essex (or T6, or JAB Wireless). ICTC has solicited GeoResults to try to obtain wireline, fixed wireless, and mobile wireless portability status for customer telephone numbers inside the CBs in question. An attachment describing the GeoResults effort is included in this filing. Based on the GeoResults data, a multitude of the CBs that Essex claims to offer voice service have little (from 0% to 10% for residential and business locations found) porting activity and based on company porting data, there is no evidence that any of that activity is related to Essex customers. Also in the Essex attachment, a news story from the JAB Wireless site shows the opening of a T6 Tech Center in Rockford, IL. In this story, it describes the area that T6 serves and none of the areas mentioned are in or contiguous to ICTC serving areas.

Finally, In order for Essex to provide the service, it must build facilities to Access Points in the ICTC footprint. To this date, ICTC has yet to receive any orders for any circuits to these “potential” access points, furthering the notion that Essex has yet to build any facilities in ICTC’s footprint.

Based on the evidence referred to above, Illinois Consolidated Telephone challenges the competitive presence of Essex Telecom, Inc. in the CBs listed on the form 505.

¹ *Petition for Partial Consideration of JAB Wireless, Inc.*, submitted June 2, 2014, in response to ET Docket No. 13-49, *Revision of Part 15 of the Commission’s Rules to Permit Unlicensed National Information Infrastructure (U-NII) Devices in the 5 GHz Band*, First Report and Order, Released April 1, 2014.

ESSEX TELECOM (T6) FAQ

17 How do I order T6 Unlimited Phone service?

Internet

How does T6 Internet service work?

T6 provides an Internet connection via a wireless antenna system. An antenna is installed on your roof with an attached radio receiver/transmitter. This antenna is pointed at a nearby Access Point tower, and **must have a clear line-of-site (no trees, buildings, or hills blocking the path)**. When you send and receive information over the Internet, it goes over the wireless link from your radio/antenna to our Access Point. From there that information travels over our "backhaul," which is a point to point wireless link to a fiber-optic connection hooked directly to the Internet. T6 service has very low "latency" (or delay) compared to satellite Internet, where signals must travel thousands of miles into space. T6 is well suited for digital phone (also known as Voice over Internet Protocol/VoIP) and other uses such as VPNs or gaming.

** reliability question*

How is it wired into my home?

T6 professionally mounts an antenna on your roof, then runs a CAT 5 wire (phone wire with 4 pairs of wires) down the outside wall of your home (we try to follow a rain gutter to hide the cable). We then bring the wire into your home by drilling a small hole or following an existing entry into the home such as a duct or prior cable, phone or satellite TV installation entry. An Ethernet jack is then installed on the inside of an exterior wall (your computer should have an Ethernet port - all new computers do. An older computer may need an adapter). If you need additional inside wiring to extend the connection into your home, you may need to hire a wiring contractor or may want to consider using a wireless router (available at computer stores) to distribute the connection throughout your home.

How do I connect multiple computers to the connection?

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ESSEX TELECOM (T6) FAQ

T6 will install a single Ethernet jack inside your home. If you have more than one computer, you will need to purchase your own wireless router. A router acts as a splitter, allowing up to four computers to be plugged in directly, and it also wirelessly sends your Internet signal throughout your home to any computer or laptop with a wireless card. An 802.11g wireless router typically can be purchased from any computer or office supply store.

Does weather affect the service?

Weather will not cause a degradation of service even in many severe storms. Your connection will remain stable even during winter months or other stormy periods. Heavy rains that are continuous over several hours/days may cause a degradation of service. Wireless Internet access requires a "line-of-site" connection from your house to one of our towers. This means that any large trees, buildings or other obstructions may cause a degraded level of service. Our installers do a site survey before installing to make sure that there is a good signal.

** Reliability question*

What are the computer requirements for T6 Internet?

Recommended requirements: Pentium 233mhz or higher; Windows 98 or higher; 64MB RAM or higher; 100MB free hard drive space. You need to have an Ethernet port on your computer or a wireless router with a wireless card in your computer to receive our service. All newer computers have an Ethernet port; for an older computer you can purchase a card at any computer store to add an Ethernet port. You can also purchase wireless routers and cards at a computer store.

How does T6 Internet access differ from standard dial-up?

Unlike dial-up, our service is always on. This means that there is no dialing, no waiting, and no need for a second phone line. In fact, our service doesn't require a phone line at all. There is also a dramatic difference in speed - T6 is over 100 times faster than dial-up service.

How long will it take to set up service?

We can typically have service installed within several days of placing an order. Once we've determined that the service will work at your location, it takes about 2-3 hours to complete the installation.

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ESSEX TELECOM (T6) FAQ

What are the advantages of T6 Unlimited Phone?

It makes long distance calls less expensive by removing some of the access charges required for use of the public telephone network. Advanced Features are included like programming, call-forwarding through a web tool, receiving email and text message notification of voicemail messages, call transfers, etc. Virtually all traditional telephone features are included in the low price and are not additional add-on charges.

How do I access my Advanced Features and manage My Phone Settings?

You may access your account through the My T6/My Phone Settings section the Webpage at www.t6b.com or <http://voice.t6b>. You will use your 10 digit T6 number as your user name and your voice mail PIN (usually 4 digits) as your password to login. Some of the features that you may manage include getting your voicemail at your email address, having a failover number (if your service should become unavailable such as during a blackout), changing the ring duration, verifying the cost of your low international rate prior to making a call, and reviewing your inbound and outbound records.

How do I transfer (port) my existing phone number?

★ suggests there is a porting option

When you sign up for T6 Unlimited Phone, you may elect to "port" (transfer) your existing phone number over to our service. That decision can be made at the time of installation or can be done at a later date. You will need to complete a Line Number Port authorization (LNP) allowing us to contact your current carrier and port your number to our service. The LNP should have the same address and account number as your present carrier has on record. This can be obtained from a recent bill from your current carrier. Fill out the LNP form left by your T6 installer. Your high speed Internet installer will leave it for you at the time of your Internet installation.

You can make this request online at our [support page \(/support/faqs/\)](/support/faqs/) and click the link 'Keep My Existing Number (LNP Form)' on the left side of the webpage and fill out the form for us to port your number.

If you are porting your existing phone number, your ATA will be shipped out approximately 2 weeks after the order has been placed. Porting a phone number takes approximately 30 business days to complete.

Does 911 service work?

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[COMPANY OVERVIEW \(HTTP://WWW.JABBROADBAND.COM/COMPANY-OVERVIEW/\)](http://www.jabbroadband.com/company-overview/)

[COVERAGE AREA \(HTTP://WWW.JABBROADBAND.COM/COVERAGE-AREA/\)](http://www.jabbroadband.com/coverage-area/)

[\(http://www.jabbroadband.com/\)](http://www.jabbroadband.com/) [SERVICES \(HTTP://WWW.JABBROADBAND.COM/SERVICES/\)](http://www.jabbroadband.com/services/)

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T6 Broadband Opens New Technology Center in Rockford

April 7, 2014

60 Employees Serve T6's Internet and Digital Phone Customers in Illinois and Wisconsin

Rockford, IL (Business Wire (<http://www.businesswire.com/news/home/20140407005195/en/T6-Broadband-Opens-Technology-Center-Rockford>)) – **April 7, 2014** / Today, T6 Broadband (<http://www.t6b.com>) opens its new regional Technology Center in Rockford; where 60 employees manage customer care, accounting, engineering, PC Care, dispatch, sales and technical support for T6's high-speed Internet and digital phone customers.

T6 is a division of JAB Broadband, the nation's leading fixed wireless company, and provides residential and business coverage in northern/central Illinois and southern Wisconsin; including areas surrounding Rockford, Freeport, Decatur, Springfield, Janesville and points in-between.

★ NOT IN ILLINOIS CONSOLIDATED TELEPHONE COMPANY SERVING AREA

"This new Technology Center enables regional and rural customers to benefit from our high quality, reliable and affordable communications access and services," said Tom Pipes, T6's Network/Operations Manager. "We expect our Technology Center will employ up to 100 staff members in the next few years."

Located at **3260 S. Alpine Drive in Rockford** (<https://www.google.com/maps/place/3260+S+Alpine+Rd/@42.2279299,-89.0288045,17z/data=!3m1!4b1!4m2!3m1!1s0x8808c0a66b70dea1:0x6627fa4e63435047?hl=en>), **T6 celebrates its grand opening today from 11:30 a.m. to 5:00 p.m. with a laptop giveaway, free BBQ, sign-up specials, radio remote and more.**

T6 offers residential packages (<http://www.t6b.com/residential/pricing-plans/>) from \$39.99 for monthly Internet service or \$52.49 for an Internet/digital phone package. T6's business package (<http://www.t6b.com/business/small-business-solutions/>) starts at \$89.90 per month for Internet and domestic/international digital phone service, ActivePhone for Business™ Messaging and more.

When combined with its highly-responsive customer support, T6's subscribers receive enhanced in-home or workplace communications services.

About T6 Broadband

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)
)
Revision of Part 15 of the Commission's Rules to)
Permit Unlicensed National Information) ET Docket No. 13-49
Infrastructure (U-NII) Devices in the 5 GHz Band)

To: The Commission

**PETITION FOR PARTIAL RECONSIDERATION OF
JAB WIRELESS, INC.**

JAB Wireless, Inc. ("JAB"), by counsel and pursuant to Section 1.429 of the Commission's Rules, hereby respectfully requests reconsideration of the Commission's decision to adopt more stringent Section 15.407 unwanted emission limits for unlicensed point-to-point and point-to-multipoint devices operating in the 5725-5850 MHz band.¹ If permitted to stand, this one rule change ultimately would prevent JAB from continuing to serve thousands of its residential and business subscribers in remote communities² that currently rely on this band to obtain fixed broadband, interconnected VoIP and E911 services. Accordingly, JAB urges the Commission to retain the existing unwanted emission limits described in Section 15.247.

Background

With about 175,000 subscribers in 14 states, JAB is the largest provider of fixed wireless broadband services in the country. JAB operates in suburban and rural areas where many consumers have little or no alternative in terrestrial providers because wired technologies are not

¹ *Revision of Part 15 of the Commission's Rules to Permit Unlicensed National Information Infrastructure (U-NII) Devices in the 5 GHz Band*, First Report and Order, ET Docket No. 13-49 (rel. Apr. 1, 2014) ("R&O").

available. JAB also delivers interconnected VoIP services to more than 20,000 subscribers on the same networks on which it delivers broadband services.²

To provide these services, JAB relies on a combination of unlicensed and lightly licensed frequencies in the 900 MHz, 2.4 GHz, 3650 MHz and 5 GHz bands for last-mile services, and uses unlicensed frequencies in the 5725-5850 MHz and licensed microwave channels for point-to-point connectivity and backhaul. JAB considers a number of factors before deciding which spectrum solution to deploy – congestion, propagation characteristics and attenuation, equipment availability, cost and time to deploy being the most common criteria. JAB has found that the 5725-5850 MHz band is often the best band for long-distance point-to-point and point-to-multi-point services because of its propagation characteristics and low cost. Fiber is much too costly to deploy to small, distant communities, and licensed microwave hops are both expensive and operate at higher frequencies with inferior propagation characteristics.

JAB currently connects approximately 60,800 subscribers to the Internet with 5725-5850 MHz band frequencies. Of these, approximately 14,800 are located more than four miles from the access point. JAB also uses the 5725-5850 MHz band for long-distance point-to-point communications between its towers and the Internet. In addition, about 15 percent of JAB's broadband subscribers also receive interconnected VoIP service. JAB is very concerned that the Commission decision to tighten the unwanted emission levels by subjecting them to Section 15.407 limits would place these subscribers at substantial risk. Not only would broadband service be affected or lost, but so, too, would E911 services that are required for JAB's VoIP service.

JAB believes that the Commission underestimated the true impact of the equipment changes that would be required to comply with the new rules. Although the Commission

² See attached Declaration of Daniel Zimmerman (Exhibit A).