



Rural Broadband Internet Services

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Principal Member of  WISPA[®]

Date: Thursday, August 14, 2014

From: Clay Stewart, CEO
SCS Broadband 45 12th Street, SW
Arrington, Va 22922

To: Secretary Dortch
Federal Communications Commission
Washington, DC 20554

Subject: 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

Since 2006, SCS Broadband has concentrated on building a network of relays and towers throughout Central Virginia. Our current service territory runs from Charlottesville to Lynchburg and from the Blue Ridge Mountains to the Piedmont Plains of central Virginia. The current network has been built entirely on private funds from owners and fees from services.

At this moment, and everyday, thousands of students in these counties are using our network for their education. People throughout our region are telecommuting, operating home businesses, working for local governments, and commercial businesses from restaurants, wineries, manufacturing plants, retail and many other business categories... using our wireless network where only satellite or high cost 3G and 4G are available. We have plans to 10Mbps today for homes, and higher speeds for businesses. With the latest 5.8Ghz equipment just arriving, such as AirFiber 5 from Ubiquiti, home plans will reach 20+Mbps in the next year or two.

SCS Broadband is a community based business, providing low cost services to homes and businesses... but also providing free and discounted services to community organizations such as community centers and churches. We have an interest to help those in low-income brackets to afford our services, and to expand our free and discounted services to more community organizations such as clubs (Lions, Kiwanis, American Legion, VFW, etc...), volunteer fire and rescue locations and other community entities.

We write in support of the petitions filed by the Wireless Internet Service Providers Association ("WISPA") et al, and all others, that are requesting reconsideration of the Commission's decision to require equipment in the 5725-5850 MHz band to meet more stringent unwanted emission limits. As adopted, this rule change will likely result in loss of broadband access for our served region, effecting all of the above types of subscribers. The effect will be devastating to our communities socially, educationally and economically.

All of SCS Broadband's point-to-point connections and a portion of our last mile to homes and businesses are using the 5.8Ghz frequency band. The cost to convert to any other bands will be insurmountable for this company after eight years of investment in current topology.

I implore the Commission to reconsider this decision, as the impact will effect thousands, perhaps, millions of people, served by the fix base wireless industry, which SCS Broadband is a proud member.

Sincerely,
Clay Stewart, CEO
SCS Broadband