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August 14, 2014

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 5 GHz Band, ET Docket No. 13-49
Comments in Support of Petition for Reconsideration of WISPA, Cambium, Mimosa Networks, JAB, Ubiquiti and dozens of previously filed WISPs

Ms. Dortch:

ICS provides fixed wireless Internet service in Northern Illinois, from the Chicago suburbs out to farms. ICS also provides turn-key consulting services for area schools and local governments.

One hundred percent of our customers' Internet traffic goes through a 5.8 GHz radio at some point. Over 95% of our fixed wireless customers receive their Internet service via a 5 GHz radio. Over 90% of our fixed wireless customers receive their Internet service via a 5.8 GHz radio. The fastest plan I offer (and can deliver unlike the mainstream competition) is 10/1. I'm hoping to double the speed of all of my plans, bringing the slowest up to a meg and the fastest to 20 megs.

At least one school district whose wireless networks I manage 100% relies on 5.8 GHz radios, not only in the delivery of their couple hundred megabit Internet service, but also connecting their different facilities together for Internet, e-mail and learning services.

A county government has a 5.8 GHz link as a backup for a rather complicated fiber route that should it go down, would cut off its health department and backup Emergency Operations Center.

Should the rules be left as they are, a significant number of my customers will be unable to be served without tremendous amounts of money invested to bring them back online. In several locations I'll have to deploy additional towers at \$14k/each just for my equipment to have a comparable coverage area, only now with no additional potential customers to pay for those expenses. All of those customers will go from a \$125 radio to a \$425 radio when the time comes to upgrade them to a new platform, labor and other parts additional. That's more than a year of service for some of those accounts. I can't afford that. My customers can't afford that.

The schools and local governments will need to upgrade to licensed band links at a cost of approximately \$14k/each, if their existing towers can handle the larger antenna that will be required. Just in the small part of the world that I touch, hundreds of thousands of dollars will be spent.



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All of this expense is for what? Who is benefitting from this rule change? The only complaints in 5 GHz have been radios interfering with TDWR operations near 5600 MHz. Those radios weren't operating in 5.8 GHz at that time, but co-channel to the radar station. They were illegally modified or set to run on those frequencies. The tightened mask wouldn't have changed anything. You already dealt with the illegally modified radios through other measures in these proceedings. Please let this simply be an oversight that the Commission swiftly corrects.

To contact me, please call 815-739-5582, my mailing address is at the top of this letter, and my email is mike.hammett@ics-il.com. Thank you for your time.

Sincerely,

Mike Hammett
Intelligent Computing Solutions, Inc.