

My company, Zinnia Networks, based in Tracy CA, offers high-speed Internet access using license-exempt bands in rural San Joaquin county in Northern California. Based on our knowledge of the needs of our customer base, I would like to make the following comments:

(a) For many of our customers, wireless service based on license-exempt bands is the only means of getting on the informaion superhighway. I applaud the commission's efforts to date in opening up spectrum for license-exempt applications and hope that more will be made available.

(b) The distances are large in the wide open spaces of the West. The commission should allow for higher power in rural areas.

(c) The 700 MHz spectrum has much better propagation characteristics through foliage and will be extremely useful for rural service providers.

(d) The use of license-exempt bands for solving the "last mile" problem is taking place, especially in rural areas. It is fulfuling a critical need. I emphasize this point because this trend does not appear be prominent on the 'radar screens' of many that track this industry. Most of the time, when they refer to the use of license-exepmt bands, they are thinking of wireless LANs.

(e) Last week, we installed a customer who has been trying to get DSL for 6 years. Rural wireless service providers like us may not be vocal, but we are putting our capital and energies into serving rural markets at a time when the incumbent telcos do not appear to be investing to serve the needs of these customers.

Thank you all for your continued support.