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Federal Communications Commission
445 Twelfth St. SW
Washington, DC 20554

RE: WT Docket 02-381

Commissioners:

Mutual Data Services is a Broadband Internet Service Provider with our primary delivery using wireless technologies in the unlicensed frequency bands. Our market is 100 % rural and spread over two counties in Central Michigan. In 2002, Mutual Data was approved for a US Department of Agriculture Rural Utilities Service Broadband loan. This funding has allowed us to provide high speed Internet access into the most rural areas of our market.

Our firm uses equipment in the 2.4 GHz, 5.2 GHz and 5.7 GHz ISM bands for point to point communications and 900 MHz and 2.4 GHz ISM band for point to multi point operation. Because of terrain and foliage issues, we typically design the network with 900 MHz WaveRider equipment as the last "leg" in our deployment to a customer.

In rural areas I would suggest the following changes:

1. Higher power capability on PTMP links, especially when installed with outdoor antennas. Provide a mechanism to report illegal or overpowered systems causing interference.

2. Lower frequency band set aside for Broadband deployment of high speed Internet access.

For Wireless ISP operations I would recommend the following:

1. Radio equipment must be spectrally efficient allowing competition in an area without causing harm to a deployed system. (An example I can site is the use of a Western Multiplex 2.4 GHz full duplex radio and if improperly deployed will cause other 2.4 ghz radios to stop working.)

2. Users of equipment in the band must have some RF knowledge before they can legally operate any equipment. Possibly certification similar to an "Amateur radio operator" certification. Limit experimentation and home grown antenna designs to a smaller part of the ISM bands.

3. Eliminate the "system" certification and replace it with a component certification. Define "professional installed system" certifications.

Sincerely,
Barry C. Buchholz
President, CEO