

Dear Sirs:

I am a rural WISP (Wireless Internet Service Provider). I started providing dialup and leased line services in May of 1997. In 1999 I started experimenting with, and eventually offering, unlicensed high-speed broadband wireless Internet and networking services.

I initially wanted to work in licensed spectrum. A call to the license holder of the MMDS licenses in my area yielded me nothing. They had licenses that could be used for providing high-speed wireless Internet but they would not negotiate leasing or selling of spectrum at any price. We are a small company and could not afford to take place in any of the auctions of available licensed spectrum

We made the decision to go with unlicensed spectrum. 3 ½ years later we are very pleased with how much this business has matured into a viable communications industry. We have built our system using 5 GHz and 2.4 GHz unlicensed spectrum. We will soon be deploying 900 MHz to work around some of the line of sight issues we have with the higher frequencies we are currently using. We are delivering broadband via our unlicensed wireless network to about 600 computers in Southern Illinois. Many of these connected computers are located in communities of less than 500 people. We have used unlicensed broadband to deliver VPN connectivity to all city government office locations throughout the City of Mt. Vernon, IL. We are working with the Jefferson County Sheriff's Department and the 911 Coordinator to bring VPN high-speed wireless connections over our unlicensed broadband network to the officers in their cars. We recently applied for funding through the USDA/RUS grant program to build broadband wireless in the small community of Bluford, IL. If funded, our network will deliver free broadband to the village hall, grade school, high school, public works, fire department and the community technology center which will also be built using these grant funds. Part of the funding will also supply money to help offset the costs of equipment needed to bring the service into homes and businesses throughout the community. One other highlight of this opportunity is that we will be offering free training to local residents in all areas of technology including the application and use of broadband in their daily lives. We are aggressively building out our networks and we are grateful to have unlicensed spectrum as an option. Without it we would not be able to offer any broadband services at all. Any help you can give is greatly appreciated.

WISPs will utilize the best technologies and frequencies we are given access to in order to aggressively deliver high quality broadband solutions to every corner of the country. We need more spectrum to insure we can do this effectively. Access to more bandwidth in the bands below 900 MHz would be an enormous help in this. Line of sight is the biggest roadblock I face to delivering service to my customers.

In rural America there are few options for broadband services. DSL loses capacity on the long phone line runs that feed rural locations. Cable companies cannot afford to build infrastructure to low density locations. Unlicensed wireless is the perfect solution to offer economical broadband to rural America. Anything the commission can do to promote further development and use of the unlicensed spectrum will help to foster more growth and use of broadband in rural locations.

A rural telephone cooperative in my service area seemingly acted to stifle the delivery of wireless broadband in the market area they serve. A member of the cooperative board asked the village board to vote against my proposal for locating broadband services on the local water tower in their location. I believe their intention was to limit the loss of revenues that would come from people moving from their dialup service to the higher speed wireless service I would have offered. I would ask that rural telephone cooperatives not be given any preferential consideration over individual WISPs. I am sure that this is not how all rural telephone cooperatives are operating but I am equally sure that I am not the only WISP provider who has lost an opportunity under similar circumstances. Rural telephone cooperatives have political clout in regard to the broadband decision making process in local rural governments. I see no reason for them to receive any preferential opportunity above that of WISPs who have been the lone driving force in the broadband deployments being built in thousands of rural areas today. If there is a business category that deserves any preferential recognition or consideration it is the WISP industry. I ask that you please recognize and consider the effort the WISP industry has made when making your decisions and to offer some means of relief to WISPs who may be stifled in their efforts to build rural broadband deployments by rural telephone cooperatives. I want to state again that I know that this is not the practice of

all rural telephone cooperatives. I just want you to be aware that there are situations where rural telephone cooperatives may not want to see any broadband solutions in their market because of competitive issues with their own existing network(s) including dialup and cellular.

I consider the opportunity to speak about the issues relating to this new industry to be a great honor and I appreciate the commission's foresighted approach to the expansion of broadband technology through unlicensed wireless in rural America. I am sure that the other 2500 or so WISPs in the United States thank you also.

Respectfully,  
John Scrivner  
President  
Mt. Vernon. Net, Inc.