

Comments to NOI 02-381 Section H

As Maine's largest wireless Internet Provider we believe that we should step forward and comment to NOI 02-381. Over the past three years we have placed wireless access points across 26 towns and cities in this state. With in the last month we moved into extremely rural areas of Penobscot County. The requests for service in these areas is astronomical. As we push further from the coast line of this state the population base drops radically. In most cases it becomes very apparent that wireless Internet is going to be the only choice of service to these small towns. Economic development directors can not bring businesses into these locations without the access to highspeed services.

As the provider of these services we have learned that operations in the license free spectrum is the only cost effective way to deliver. As presently designed the auction system of licensed spectrum is unavailable to small business. The largest phone companies in the world gobble up the licenses at insane prices, or middle men speculators buy the spectrum for the purpose of leasing out space at ridiculous costs. This being said what can the FCC do to help the smallest of towns and cities in our state? Give wireless providers the ability to increase power in outdoor, free spectrum delivery systems.

We see that the average customer base that can be reached from a single access point, under existing rules is 15 users in rural areas. Two factors cause this to happen. First being financial. Users think the cost of services is too high for their economy. (\$49.95 per month) Second we can not reach out far enough to make connection with existing power amplification rules. We are not going to interfere with licensed services in the woods of Maine. A walk around this state with a spectrum analyzer shows no use of licensed frequency in and around the unlicensed spectrum except for University ITV systems. With this as a provable fact, expansion of the EIRP to 25watts for our outdoor systems would have zero effect on any license holder.

With the increased power gain we could expand to more cities, towns, and townships quicker and with less infrastructure costs. The goal is broadband everywhere in America. The need is to increase business productivity and grow small business. The answer is allow the market place to deploy systems to meet the demand. Giving Wireless Internet Services Providers increased power to service very rural communities makes the return on investment much easier to swallow. This will mean a faster deployment schedule to the back woods of Maine.

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