I think defining rural in terms of "persons per square mile" is the best approach.

In particular, section H/paragraph 29: "Should unlicensed devices be permitted to use higher output levels in [rural] environments?"

Yes. Raising the limit to 10, or even 100 watts would go far in giving both rural customers and rural service providers economies of scale comparable to those found in urban markets.

"[What] criteria would have to be met in order to qualify to use the higher power levels?"

An easy criterion to name -- but not so easy to implement -- would be based on "people per square mile." If such a criterion is to be implemented in hardware it could get tricky, especially when the customers are in wooded areas where GPS reception is precluded. Perhaps a better approach would be a combination of frequency agility (based on carrier sensing) and a sort of "Urban Beacon" system, in which reception of the beacon would signal the unlicensed equipment to use a lower output level.

Respectfully submitted,

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