

AMA TECHTEL

communications

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February 3, 2003

Federal Communications Commission
445 12th Street SW
Washington, DC 20554

RE: ET Docket 02-380 & WT Docket 02-381

Dear Commission:

This comment filing is in reference to the Commission's request for public comment on how unlicensed wireless is being used to deliver broadband services to rural America. While AMA Wireless L.L.C. cannot speak for the whole of America, we can share with the Commission our story as an operator with one of the largest single state deployments of wireless broadband using unlicensed bands in the United States.

AMA Wireless is a subsidiary of Attebury Grain, Inc. How AMA Wireless came into existence is unusual. Attebury Grain, founded in 1954, is the 6th largest grain company (by storage capacity) in the United States and the largest in Texas. Attebury Grain operates in many rural towns and is, in many cases, the largest taxpayer and employer in the community. As such, we have long viewed ourselves as community partners and have developed and supported numerous programs that enhance the quality of life in those communities.

With facilities in more than 50 locations, Attebury had a need to connect its diverse operations with high-speed communications. In 2000, after a detailed analysis of technologies and their limited availability in small communities, Attebury was left with few viable options other than building its own system using wireless technology. We decided to go with unlicensed wireless because there was no access to licensed frequencies. Attebury partnered with AMA Online, a local ISP. Founded in 1995, AMA Online delivered web services and connectivity to the Internet via dial up and leased lines to many businesses, residences and public agencies in the Amarillo area.

In the early phase of planning and design we recognized a tremendous opportunity to bring high-speed Internet access to Amarillo and the Texas Panhandle. Thus was born AMA Wireless. In December 2002, we completed a purchase of a regional CLEC called TechTel. As of this filing, the new company, AMA Communications, L.L.C. (dba AMA • TechTel) serves a combined customer base of 18,000, approximately 4,000 of whom are wireless broadband subscribers using licensed-exempt wireless supported by Alvarion's BreezeACCESS solution. Our wireless footprint now exceeds 20,000 square miles.

AMA • TechTel is a highly stable, financially secure company with a strong community-oriented mindset. AMA • TechTel chose Alvarion in part to protect that reputation. We are aware that many small operators use WLAN products, but we required a professional level solution. We were pleased to find that FCC-certified systems for this application actually exist through leading vendors like Alvarion. But they could not have developed such high-grade solutions had the Part 15 rules not been so flexible. Without the ability to leverage unlicensed bands, it is highly likely that AMA • TechTel would not have been created, which means thousands in our rural partner communities would still be without broadband.

Among our customers are schools, public offices, and approximately 3,000 local and rural residences and businesses. Though we compete in some markets with other types of services, we also serve many locations where no wireline broadband alternative exists.

Some have asked us why we did not seek licensed bands. AMA prides itself on sound management, stable growth, customer service, and community partnership. With respect to broadband, there were too many failed examples of wireless using licensed bands and we were not willing to join those ranks. Nor were we willing to encumber ourselves with high spectrum debt that still seems to plague those who participated in spectrum speculating. Our brand and stability were far too important to put at risk. As well, Alvarion was able to prove to us that their system could operate successfully even in a spectrally-competitive area. In fact, other wireless providers exist within our markets. With well over 1,500 subscribers, our companies combine for over 6,000 connections in the region using unlicensed spectrum. For this same reason, we strongly believe the issue of "spectrum meltdown" is a myth. Those making poor technology choices may experience insurmountable problems, but those of us deploying solutions designed for the application, and implementing them with care and professional planning and design, need not fear common spectrum.

It is AMA ● TechTel's position that the FCC should consider increasing power levels within the unlicensed bands. This ruling would reduce tower construction costs in many rural areas allowing for greater serviceability and faster deployment.

Opening up additional spectrum in the sub-1GHz band for use in the unlicensed arena is also our recommendation. This allows for greater solutions with regards to non-line of sight (NLOS) issues where these prevail and would allow effective spectrum utilization.

AMA ● TechTel also feels that the FCC should allow providers such as ourselves to utilize the 700MHz frequency where broadcasters have traditionally provided service. As broadcasters are converting to digital transmissions, vacancy is occurring because the spectrum is used with greater efficiency. This allows for greater bandwidth, and in turn greater opportunities for rural providers to increase services to rural communities.

Where do we go from here? AMA ● TechTel has refined its model and is experiencing rapid, managed growth. We operate a world class, secure network with guaranteed uptime, QoS, and advanced services like VPNs. We fully expect to at least double our wireless customer base, expand within our existing footprint, and grow into other Texas markets. We will continue to leverage unlicensed bands; in fact, we will leverage multiple bands to include 900MHz, 2.4GHz, and 5.7GHz for last mile connections to our customers. We also leverage unlicensed bands within 5GHz to connect most of our tower locations (many are actually grain elevators). AMA ● TechTel strongly encourages the FCC to consider its comments and recommendations.

AMA ● TechTel appreciates the opportunity to share with the FCC its story and the critical role unlicensed frequency band has played in its founding and growth. Should you have further questions, we would welcome your questions. Please contact me at douglascampbell@amaonline.com for more information.

Respectfully,



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