

WISP Homestead Policy
Proposal For WISP Use of the ITFS Band

John Scrivner

Mt. Vernon. Net, Inc.

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I own and operate a WISP (Wireless Internet Service Provider) in rural Southern Illinois. I provide services over the network I have built there that exceed the quality and varied uses seen in any other broadband based networks. Internet access is only a small part of the equation. I have many corporations who trust their wireless network as a path between their home and office. The entire city of Mt. Vernon, IL. uses the wireless network to interconnect all of the city government offices there. I have links that interconnect schools. The county enhanced 911 system has purchased interconnection via a link we built and maintain which interconnects the police department to the county court house. We are building WiFi mobile technology into police cars with high encryption IPsec VPN technology. These links exceed the standards of security required by all levels of the government. This is not just coffee shop WiFi we are discussing as can be seen from the above examples.

This type of highly engrained use of this technology in small towns and metro areas is not unique to Mt. Vernon, IL. These services are part of the infrastructure of our communities now on a worldwide scale. The aggressive adoption of these bands has come with little protections to WISPs and their high profile customers and is in danger of creating a disastrous implosion if nothing is done to remedy the impending interference hazards on the horizon. WISPs have no rights to the spectrum they use. Licenses are too expensive and the licensing process is absolutely disconnected from the highest growth sector in wireless history. WISPs are that sector.

I want to suggest a policy to help solve these issues and provide unlicensed use of this band simultaneously. I propose a new policy called the "WISP Homestead Policy". This Homestead policy would allow unlicensed use of the ITFS band. It would also allow for WISPs to eventually "homestead" within this band if it can prove that doing so causes no hardship to others and is being done aggressively to make use of the band in short order. Homestead status would be given to WISPs who register with the FCC and provide documentation proving active use of ITFS frequencies within a

given market service area. Areas where no homestead registration is made would be unlicensed with no restrictions or exceptions for WISPs.. There would be no enforcement of license rights unless a homestead operator proves they have a claim to spectrum and that they are receiving interference from other sources.

Part-15 devices that interfere with a homestead WISP operation that are not owned and operated by a homestead would be required to change channels or move their equipment to alleviate the interference. This would be the extent of the rights granted WISPs within this band.

Each geographic area would be allowed a maximum of two homestead WISP operators per service area. These operators would have to agree to binding spectrum arbitration as a last resort over frequency disputes and database registration of frequency usage.

Homestead WISPs would be able to finally offer their services with guarantees of quality of service and uptime. This is something they could never do until now. WISP operations have been relegated to the “best effort” category of access services for far too long. We are the industry bringing high speed broadband Internet access to under served areas and in many cases to areas with no other broadband options at all. WISPs are not asking for a complete protection policy. WISPs do need at least a minimal amount of protections in order to secure capital investment, bank loans and peace of mind in knowing our networks will not fail because of issues over which we have no control. Interference is the greatest fear of WISPs. This fear is stronger than that of lightning damage, other competitors and money issues combined. I feel the WISP Homestead Policy could be used to allocate the use of the ITFS band in a responsible and highly accepted method. The secondary unlicensed status of the band ensures that it will be available for use freely on a non-interference secondary basis to any unlicensed devices designed to Part-15 specifications.

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