I am Michael Maranda, Board President of CTCNet Chicago, President Elect of the Asociation for Community Networking, a VP of NPOTechs, and a founding member of Chi-Fi, a community wireless inititative in the Chicago area. I am heavily involved in community networking and community technology issues. I am writing to advocate for the position expressed by groups such as NYCWireless and CUWiN.

Access to the spectrum under consideration by low power devices will revolutionize our concepts of communication technologies and possibilities, both in terms of the technical and in terms of ownership.

Locking down the bandwidth to licensed incumbents leads to an over-all net-loss to the community in terms of economic development potential. I think this is clear in the case of the wireless spectrum as with the incentive for buildout of higher capacity fiber.

A recent article in the Economist makes an excellent case that spectrum should be treated in a different way than it has been. Technological developents (software and hardware) make it possible for "intelligent" or "adaptive" nodes to better use the low power segments of spectrum than were possible when current (or early) spectrum policy was adopted.

The misperceptions that abound regarding the potential for this technology results from the constraints of the current spectrum policy more so than from the products that are produced for sale under the current spectrum regime. With a different policy our communications could be transmitted over different frequencies of spectrum, currently held by licensed incumbents, using older technology and who are not making effective or efficient use of these frequencies.

In the low-power realm, such technologies as wireless meshing (See the Champagn Urbana Community Wireless Network project) will extend internet and community networking capacity in new ways, liberating networks from the constraints of last-mile build-out and cost attributable to incumbents without the interest or foresight to develop these communication technologies.

Putting it another way, they are shrewdly defending entrenched interests, at the cost of the greater economic development of the community and against the interests of the public good.

Communications policy has shifted very far from the principles of common law in permitting incumbent communications providers to differentiate in rates (tarrifs) to use the same network infrastructure, and in permitting the licensing of a public resource to those who will not utilize it efficiently, or even over the majority of the actual geographic availability of the spectrum.

The FCC should fund research that determines to what extent licensed holders of sprectrum are using the spectrum allocated. I suggest

this research cover semi-rural areas as well as urban. The FCC should not use this research as a strategy to take rights away from the public sector without investigating use by well-funded incumbents.

On issue of "installer requirements" for low-power equipment this does not make much sense. Likewise, the question of identity beacons in mobile devices must be weighed carefully with due consideration of how this impacts the right to privacy. Also, on what grounds will the identity be disclosed and to whom? Its a slippery slope.