

04-451

BPS Networks is an Internet service provider that utilizes unlicensed spectrum to provide service to rural south east Missouri. BPS Networks is currently service markets that are underserved, and in many cases, BPS Networks is the only provider of high speed internet service in our marketplace. Because of the low cost of entry, BPS Networks has been able to provide these services in areas that would otherwise not be economically feasible. Many of these communities are less than 500 in population.

BPS Networks is utilizing unlicensed spectrum as a last mile solution. We are currently utilizing equipment in the 900MHz and 2.4GHz bands for last mile "cpe" devices. Additionally, BPS Networks is using the 2.4GHz and 5.8GHz bands for our backhaul solutions into these smaller communities. BPS Networks would be very pleased to see additional spectrum made available for our use. The 3650-3700MHz band would work very well within our network. In order to make this band useful for unlicensed use, and to keep the cost of deployment low, the rules that are established should not unnecessarily add demands on the manufacturers of the equipment. In other words, the rules should allow for vendors to make simple adaptations of existing equipment and product lines to operate in this band.

Additionally, BPS Networks would recommend that this band be opened up exclusively for outdoor broadband use. Currently, the 2.4GHz band as well as the 900MHz band is being utilized for a variety of applications. Much of the clutter in these bands significantly reduces the usefulness in many areas. Opening the 3650-3700 MHz band for unlicensed use as an outdoor broadband only application would make this band very useful to achieve the commissions stated goal of promoting the deployment of broadband in unserved and underserved areas in rural America.