

* Indoor wireless signals from consumer equipment used in residences and businesses are raising the noise floor on existing Part 15 bands, making them more difficult to use for "last mile" broadband;

* Customers often unknowingly operate indoor and outdoor equipment on the same frequencies, causing self-interference;

* Current EIRP limitations in the 900 MHz, 2.4 GHz, and 5.8 GHz bands limit the range of wireless broadband access points, making them less than economical to deploy in sparsely populated areas;

* There is already precedent for limiting frequencies to indoor use in the current Part 15 regulations; it is equally appropriate to limit frequencies to outdoor use to prevent interference;

* No one has claimed -- in this proceeding or elsewhere -- that there is a shortage of spectrum for consumer devices that are typically used indoors;

* If the FCC is to claim that wireless broadband represents effective intermodal competition for DSL and cable modem service, more spectrum and greater operating ranges are required. This should be addressed immediately. Many areas are underserved by the normal wired data services. Wireless represents the only chance that many have to access the internet at broadband rates. The problem is that WISP's are handcuffed with the limited amount of frequencies and power limitations placed on them.