Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of

Amendment of the Commission’s Rules with Regard to Commercial Operations in the 3550 – 3650 MHz Band

GN Docket No. 12-354

To the Commission:

Additional Comment of Nickolaus E. Leggett, N3NL
Amateur Radio Operator, Inventor, and Analyst

This additional comment is to clarify that my comments submitted and posted on December 21, 2012 are directed at operations conducted within the General Authorized Access (GAA) licensing tier of the Citizens Broadband Service.

In addition, the rules established for the GAA tier should allow for the introduction of new protocols that will allow more effective use of microwave mobile and portable stations. One such protocol is the Lighthouse Protocol that I developed and published. Reference One.

The Commission should also consider granting Priority Access to users who operate networks that are highly resistant to damaging situations such as solar geomagnetic storms, electromagnetic pulse (EMP) attacks, terrorist physical attacks, or cyber warfare attacks. The social values of such resistant networks justify grants of Priority Access tier licensing.

Comments of Nickolaus E. Leggett 1
Respectfully submitted,

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December 26, 2012

Reference One: