COMMENTS OF
THE WIRELESS INTERNET SERVICE PROVIDERS ASSOCIATION

The Wireless Internet Service Providers Association ("WISPA"), pursuant to Section 1.405 of the Commission’s Rules, hereby files Comments supporting the Petition for Rulemaking ("Petition") filed by the Fixed Wireless Communications Coalition ("FWCC") in the above-captioned proceeding.¹

Introduction

WISPA represents the interests of more than 700 fixed wireless Internet service providers ("WISPs"), vendors, system integrators and others interested in promoting the growth and delivery of fixed wireless broadband services to Americans. WISPA estimates that more than 2,500 WISPs operate in the United States today. Using primarily license-free frequencies authorized under Part 15 of the Commission’s Rules, WISPs provide fixed wireless broadband services to more than 3,000,000 people in residences, businesses, hospitals, public safety locations and educational facilities.

Notwithstanding their success in serving areas that other technologies cannot cost-effectively reach or other providers elect not to serve, WISPs face significant barriers to

extending service to unserved and underserved areas where DSL and high-speed cable are not available. The Commission has correctly observed that broadband providers require “adequate, reasonably priced, and efficiently provided access to both middle mile and second mile connectivity.” But in many areas of the country, affordable connectivity options that deliver middle mile and second mile bandwidth often do not exist. As WISPA stated in Comments regarding the National Broadband Plan:

WISPs often lack affordable and competitive “second mile” and “middle mile” connectivity. Sparsely populated remote areas are more expensive to serve with any terrestrial technology, but in many cases fixed wireless offers the only sustainable business model. Yet, even with fixed wireless, lack of connectivity to the Internet backbone is a critical problem that must be addressed if broadband availability and adoption are to increase.3

More recently, WISPA supported the Commission’s proposal to make 750 megahertz of BAS and CARS spectrum in the 7 and 13 GHz bands available on a shared basis for fixed and backhaul services.4

Discussion

In its Petition, FWCC asks the Commission to “restart” the proceeding to establish service rules for the 41.0-42.5 GHz band, stating that it is “ideally suited to handling backhaul over the relatively short distances encountered in urban and suburban environments....”5 FWCC proposes link-based licensing with prior frequency

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5 Petition at 1-2.
coordination rather than area-based licensing. FWCC requests that the Commission adopt service rules for the 42 GHz band to enable short-distance backhaul links to meet increasing bandwidth demands.

WISPA believes that FWCC has made a strong case for the adoption of service rules, and urges the Commission to initiate a rulemaking proceeding. Access to additional spectrum for backhaul can benefit those WISPs that need only a short link to provide backhaul and point-to-point connectivity, and the propagation characteristics of the 42 GHz band are well-suited to provide these services. Moreover, WISPs may prefer using licensed wireless links instead of leased fiber lines (if available). Through the development of a complete record, the Commission can craft rules that will efficiently license and promote non-interfering use of the band. WISPA looks forward to providing more detailed comments on service rules once the Commission adopts a notice of proposed rulemaking.

Respectfully submitted,

THE WIRELESS INTERNET SERVICE PROVIDERS ASSOCIATION

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By: /s/ Elizabeth Bowles, President
    /s/ Jack Unger, Chair of FCC Committee

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