



March 15, 2007

To:
The Federal Trade Commission
Office of the Secretary,
Room H-135 (Annex B),
600 Pennsylvania Avenue, NW,
Washington, DC 20580

Broadband Connectivity Competition Policy Workshop - Comment, Project No. V070000

WISPA's Submitted Comments Regarding the FTC's Feb 13th & 14th Broadband Showcase Workshop..

WISPA (the Wireless Internet Service Provider Association) wishes to commend the FTC for putting forth the effort to organize and host the Broadband Showcase that it held in February.

Clearly, in this time of rapid growth for the Internet industry, it is important for the FTC to add its voice to that of other government regulatory agencies who are examining the Broadband Services marketplace.

WISPA respectfully wishes to convey to the FTC the position that WISPs occupy in the broadband marketplace. It is WISPA's opinion that WISPs represent the only truly independent competitive actor in the marketplace--which is usually dominated by very large broadband providers. As such, WISPA would like to suggest to the FTC that, in the event that this event is organized again, the FTC should consider inviting WISPs to be part of the discussion.

In 2004 WISPA surveyed the main vendors in our industry and estimated that there were 3000 to 6000 WISPs servicing 1,000,000 plus customers. A 2006 PEW report on the Internet placed the number of BWIA (broadband wireless internet access) users at 6,000,000.

Despite the clear pace of Broadband adoption in the US, in many cases the WISP is the only available choice for many US consumers in areas that do not have service offerings from the cable/telco monopolies. WISPs, therefore, have been a significant driving force behind broadband expansion—and continue to be so especially in rural markets. Nearly every WISP whose business is more than a couple of years old has stories of a market that started with no broadband service coverage.

In this context, WISPA would like to bring to the attention of the FTC the fact that it is commonplace for WISPs to compete directly against wholly owned subsidiaries of subsidized or monopoly status competitors. We would also like to point out that telcos, the recipients of USF funds, use these funds to build the infrastructure needed to deliver broadband. On the heels of such build-outs, it is not uncommon for these same telcos to then undercut the local WISP with this same USF funded infrastructure.

On a regulatory policy front, we believe that recent consolidations in the telecom Industry have all



but erased the 1984 breakup and that a return to the “Ma Bell” days is not in the consumer’s best interests. Cable companies are basically down to two nationwide. Who's left to provide consumer choice? In the telco world they own the copper plant and are no longer required to share any of it with anyone that may compete with there offered Internet services. Cable companies are not much different in that they too are a Broadband Internet mono-culture which is usually rarely motivated to build new infrastructure to service consumers unless the market for them is large enough.

In closing, some other points of interest.. WISPs have provided, and will continue to provide, a large-scale third “Internet pipe” to average homes and businesses across the US. WISPs represent a significantly large-scale broadband infrastructure across the United States that is independently controlled. WISPs in many places still continue to be the only or 2nd choice for providing broadband services to many US consumers.

WISPA welcomes further interactions with the FTC and is at the FTC’s disposal should opportunities to do so present themselves.

Sincerely,

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About WISPA..

WISPA is the wireless broadband industry's only industry owned and controlled trade association. Our members are generally entrepreneurs that offer a variety of broadband Internet services using both License Exempt and licensed wireless technology. And, though many of our membership are smaller in size when compared to the larger wireline Internet Service Providers (ISP’s), WISPs do constitute a 3rd Internet pipe in the US market and also in many places around the world.

cc WISPA Board of Directors
WISPA FCC Committee email list