I would like to provide our support to the Part-15.org's filling and think it would be a step back and misstake to make the 3650-3700MHz spectrum a licensed spectrum. WISP's and other outdoor wireless network operators need a spectrum that is free from SoHo and enduser use. It would be a misstake to require an expensive license to operate in this spectrum unless it's a just a low cost control license such as is used for GMRS/FRS to keep track of whom is using it and where.

If it wasn't for unlicensed operation the entire WISP industry would NOT be what it is today. It's thanks to unlicensed and the easy availability to operate that created over 8000 WISP's in this country that is serving so many people in the rural areas where no other high-speed service today otherwise would be available as well give DSL and Cable companies a run for their money and preventing monopoly status to be created by the DSL and Cable companies where they split the markets up between each others.

WISP's are the only operators today that will keep the DSL and cable companies on their toes and keep pushing their rollout plans.

In many areas DSL and/or Cable companies have moved up their roll out plans with as much as 2-3 years sooner then their original plans just because a WISP started service and due to the WISP starting offering service the DSL and/or Cable companies gotten pushed to start offering service if they wanted to steal any market shares.

WISP's needs this additional frequency spectrum in mid 3Ghz and this spectrum should be kept clean from soho, home use as well scada type systems.

As well additional spectrum in none line of sight capable frequencies is something that the WISP's need desperately and this should be a spectrum that is for WISP's only. Just like 3650-3700 this none line of sight spectrum (assumable in the 700Mhz spectrum) should be a WISP only spectrum. SCADA system, cordless phones and similar usage in the unlicensed 900Mhz spectrum have in many areas rendered this spectrum unusable for WISP usage.

The lower frequencies such as 900 and 700MHz is the only real weapon a WISP have and could have to truely combat none line of sight issues that are extremely common in many residential areas.

