

Central Park Systems

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Department of Commerce, National Telecommunications and Information Administration

Dear Sir or Madam:

We believe that “competition” and “choice” are essential to promoting broadband adoption and expansion into unserved and underserved areas. The telecom reform act of 1996 failed to produce meaningful competition due to the dependence on incumbent carriers for “last-mile” access to the customer premise. The expense of dealing with incumbent carriers locks smaller companies out of the market.

WiMAX technology now makes it economically feasible for a small carrier to build a last mile network. WiMAX technology was not available before the “telecom bubble” burst in 2002. Unfortunately, capital is not readily available for startup companies that are ready to deploy WiMAX. We believe that Federal assistance would spark a new wave of private investment for wireless last mile networks.

We would like to see an emphasis in creating “community oriented” WiMAX last mile networks to support innovation in Healthcare, Education and Public Safety. We believe that every municipality should have a local service provider, focused on the specific needs of the local community.

Smaller companies can focus on the statutory purposes specific to a local community where large incumbents are not the firms with the best incentives and business models to promote innovation. Some of the large firms have a historical predatory conduct that hampers innovation and competition. In fact, much innovation today is being lost through anti-competitive consolidation.

Smaller, technically-oriented companies often assume the type of risk (and the amount of risk) that is not often tolerated by large companies. In the United States both consumers and companies depend on smaller, high-tech companies to explore the commercial application of new technologies such as WiMAX.

Sincerely,

Peter J Oliver
President