From: James Meyers [mailto:jim@alphamedia.tv]
Sent: Tuesday, June 09, 2015 3:43 PM
To: 'BOCrfc2015@ntia.doc.gov.'
Cc: 'W. Douglas Stewart (dstewart@alphamedia.tv)'; 'Sandler, Reuben'
Subject: Broadband Opportunity Council Notice and Request for Comment

June 10, 2015
The National Telecommunications and Information Administration (NTIA) United States Departments of Agriculture and Commerce
1401 Constitution Avenue NW, Room 4626
Attn: Broadband Opportunity Council, Washington, DC 20230 To Whom It May Concern:
We are replying to the Request For Comment (RFC), issued by the Broadband Opportunity Council (BOC), on April 28, 2015.
While the RFC appears to primarily request comments by the public, mostly regarding policy and other issues, that could be impeding, or changed to promote availability of broadband access in rural areas, we wish to make the BOC aware of a broadband distribution technology option, that could immediately and significantly advance the availability of high-speed wireless broadband access to the public, particularly in rural areas, in the USA.

Our company, Choice Broadband, Inc. (CBB) and its partners have developed a proprietary and patented, UHF-based broadband distribution system, which incorporates the full DOCSIS protocol into a UHF wireless environment. The UHF broadband system operates in the 700Mhz – 800Mhz bandwidth spectrum. Establishing a new broadband protocol, “WiDox” (for long distance transmission and reception), the UHF system achieves a distribution/reception signal radius, exceeding 30 km, and beyond. The UHF WiDox system is proven commercially, and is currently deployed in over 150 locations, throughout the world. The WiDox UHF system is ideally suited for providing broadband distribution solutions in remote geographic settings, requiring excessively broad areas of broadband access, at a significant cost savings, compared to other traditional broadband distribution technologies.

As the BOC is well aware, rural areas have had a particularly difficult time in attracting major telecommunications companies to provide broadband access in their communities, primarily due to the low housing density in rural areas, which prohibits traditional wireline system construction, due to low return on the capital requirements to build wireline systems for broadband distribution.

The CBB broadband distribution system utilizes UHF wireless technology, which enables the broadband access signal to transmit to 30 km and beyond, with bandwidth speeds up to 200 MBps. The UHF transmitters can be mounted on traditional existing or newly installed towers, and provides immediate broadband signal availability to all areas within the reach of the transmitter, which typically encompasses 2,800 square kilometers, per tower.

The CBB broadband distribution system has been deployed in multiple Indian reservations in Canada (First Nation) and the USA, and performs perfectly. CBB now wishes to expand the deployment of our wireless broadband distribution technology to additional rural areas in the USA, and seeks the assistance of the BOC, in being considered to reach the objective the BOC has envisioned.

A separate Technical Information Sheet & Summary follows.

We look forward to hearing from the BOC, regarding how Choice Broadband can work with the Broadband Opportunity Council, to provide high speed wireless broadband access to all of rural America.

Sincerely,
James Meyers
CEO
Choice Broadband
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Choice Broadband, Inc. Technical Information & Summary

WiDox Broadband Technology Summary

WiDox proprietary UHF technology offers a “Last Mile” broadband distribution solution, integrating superior scalability and propagation, encompassing significantly broader reach andgreater speeds, compared to conventional WiMax broadband distribution technology.

The WiDox proprietary technology utilizes multiple trade secrets, which delivers significant technology and cost advantages, as compared to competing technologies and companies.

Decentralized Assets and Operations, with strong Centralized Management systems, creates a superior customer experience, generating increased customer satisfaction, in association with lower maintenance and installation costs.

WiDox proprietary UHF broadband distribution technology is ideally suited for providing Last Mile broadband distribution solutions in remote geographic settings, requiring excessively broad areas of broadband access, at a significant cost savings.

WiDox technology has been installed and represents operating broadband distribution systems in over 150 locations, many in remote communities worldwide, including Alaska, American Samoa, Northern Canada, Hawaii, India, Kenya, Tahiti, Tonga, and Uganda.

WiDox vs. WiMax Comparison

Offering a 30 kM radius of coverage through a single distribution point, not affected by line of sight issues, WiDox is clearly superior to WiMax technology that offers a 2 kM radius of coverage, requiring overlapping frequencies, impeded by line of sight issues.
WiDox offers expanded reach and increased speed over WiMax technologies, with significantly reduced capital requirements.

WiDox Architecture Summary

The WiDox architecture increases the number of potential target rural communities in both population and geographic location, while decreasing the breakeven subscriber level, and reduces the deployment and ongoing operational costs of broadband distribution networks.

WiDox vs. WiMax Competitive Analysis Summary

WiDox proprietary broadband distribution technology offers 100X the coverage footprint provided by WiMax and similar wireless and wired traditional broadband technology options, such as 3G/4G and DSL.

In a traditional WiDox installation, the proprietary broadband distribution technology can provide greater than 1 GBps, greater than 60GB Bandwidth Caps, Phone Service, Long Distance, and the ability to reach outlying constituents, while no other existing standard technology or operator can deliver this entire suite of services.

For WiMax to achieve the same coverage area as WiDox would require 25 distribution points, each priced the same as 1 WiDox distribution point.

WiDox Services Summary

WiDox proprietary broadband distribution technology can also provide additional VoiceAxxess (Telephony) Services, including VoIP telephone services, Voicemail & Caller ID, and Call Forwarding & Conferencing.

WiDox technology can also provide additional CommunityAxxess (Broadband) Services, including Web Hosting Services, Email Accounts, Personal Web Pages, Personal, Public & Group Shared Disk Storage, Firewall, Backup & Redundancy, and File, Print & Streaming Services.

WiDox vs. WiMax Unit Economics Comparison

WiDox technology provides 2,800 square kilometers of coverage thru a single distribution point, at an approximate capital cost of $225,000 USD, with a projected payback period of 12 months, as demonstrated during 2012, in Prince Albert, Canada.

For WiMax technology to provide 1,800 square kilometers of coverage, would require utilizing 25 multiple distribution points, at an approximate capital cost of $5,625,000 USD, with a projected payback period of 300 months, as demonstrated during 2012, in Prince Albert, Canada.

Management Expertise & Experience

The management team represents extensive domestic and international expertise and experience, including previous positions at DirecTV International, DirecTV Japan, and Intelligent Optical Systems, comprising significant telecommunications and i-Banking experience.

Specifications subject to change without notice.