

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking to
Consider Modifications to the California
Advanced Services Fund.

RULEMAKING 12-10-012

**COMMENTS OF FIRE2WIRE
ON RULEMAKING 12-10-012 FOR OIR TO
CONSIDER MODIFICATIONS TO THE CASE**

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December 3, 2012

Fire2Wire hereby submits its Comments in response to the **Order Instituting Rulemaking 12-10-012 to Consider Modifications to the California Advanced Services Fund.**

Fire2Wire supports the proposed revision of the eligibility requirements for participation in the California Advanced Service Fund (CASF) to include non-CPCN/WIR candidates. As a Wireless Internet Service Provider (WISP), Fire2Wire has used unlicensed and licensed spectrum to provide fixed wireless broadband services in the San Joaquin Valley region of central California since 2001. In our opinion, fixed wireless broadband is currently the only economical option for delivering low latency broadband services to rural California.

In response to the commission's question regarding the potential use of CASF funds, Fire2Wire would consider participating in the CASF program if the eligibility requirements were changed. For example, middle mile facilities are scarce in many of the rural unserved and underserved areas. WISPs typically use unlicensed or licensed wireless equipment for middle mile facilities. Given the increasing demand for bandwidth, and increasing congestion in unlicensed bands, licensed wireless equipment is becoming a requirement for delivering the service expected by consumers and business users. The cost of licensed wireless equipment significantly increases the ROI for the typical WISP when compared to unlicensed wireless equipment. CASF funds could be used to offset the one time capital expenses involved in extending the middle mile infrastructure.

Overall, Fire2Wire recommends the proposed changes to the CASF requirements as we believe it will ultimately serve the greatest benefit by enabling WISPs to expedite delivery of broadband services to the unserved and underserved areas in California. Fire2Wire thanks the commission for its consideration of our comments.

Dated: December 3, 2012

Respectfully,

FIRE2WIRE

/S/ Kristian Hoffmann

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