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February 12, 2016

The Honorable Greg Walden, Chairman  
Subcommittee on Communications and Technology  
Committee on Energy and Commerce  
2125 Rayburn House Office Building  
Washington, D.C. 20515-6115

The Honorable Anna G. Eshoo, Ranking Member  
Subcommittee on Communications and Technology  
241 Cannon House Office Building  
Washington, DC 20515

Dear Chairman Walden and Ranking Member Eshoo:

On behalf of the Wireless Internet Service Providers Association (WISPA), attached is our response to the questions posed in your January 29, 2016 for inclusion in the record.

Thank you for the opportunity to testify at the January 12, 2016 hearing. I appreciate the opportunity to work with you and your staffs.

Please contact me if you have any questions.

Sincerely,

*/s/ Elizabeth Bowles*  
Elizabeth Bowles  
Legislative Committee Chair

Enclosure

**1. Under the FCC's enhanced transparency requirements, consumers are entitled to receive information on promotional rates, all fees and/or surcharges, as well as all data caps and allowances. Can you identify what costs would be associated with providing consumers with this specific information?**

WISPA has identified a number of costs that would be associated with providing this specific information, and we recently polled our members to obtain their estimates. The largest Member to complete the survey has 4,000 customers, and the smallest member to complete the survey has one customer. The responses below are based on the results of the survey.

First, with respect to completing the Safe Harbor Fixed Broadband Consumer Disclosure Form the first time, our responding members estimated that it would require the following:

1. Outside engineer
2. Technical writer
3. Administrator
4. Web administrator
5. Outside Counsel and/or Consultant

According to our members, the recurring annual costs for filling out the form using all or some of these range from a low of \$2,500 (where most work is done by internal staff) to a high of \$20,600 (when outside assistance needs to be retained).

Second, with respect to the costs for ongoing compliance to complete the Consumer Disclosure Form to reflect changes in equipment, pricing, and service offerings, the survey respondents estimated a range of \$1,000/year to \$36,000/year depending on the size of the WISP and the need for outside counsel.

Third, compliance with the enhanced disclosure requirement concerning the "actual average performance of service during peak usage" will require our Members to purchase additional equipment at an average cost of \$50,000, depending on the number of customers.

Fourth, to the extent WISPA's Members would be required to measure packet loss, they would need to purchase equipment at an average cost of \$70,000, depending on the number of customers.

Finally, with respect to ongoing compliance costs following the initial completion of the Safe Harbor Form and the purchase of additional equipment, our Members estimate these costs to be approximately \$40,000 annually.

Some of our members were unable to answer the question about the costs of compliance because they lack sufficient knowledge of the scope and complexity of the requirements. For example, one member responded as follows:

I have no idea how much this would cost, but I'm already having trouble filing the 477 (they keep coming back for more information and a revised filing, so I have to do it over and over again). . . . I think the error might be coming from the filing information that came from them, but again as a small WISP with no one to handle this aspect I don't have time to research the issue and fix it.

**2. What is the average size of a WISPA member?**

Approximately 1,400.

**3. How many customers does your largest Member company serve?**

WISPA's largest Member company serves approximately 200,000 customers. This is the only WISPA Member with more than 100,000 customers. WISPA has two Members that serve more than 10,000 customers. The remaining Members serve less than 10,000 customers.

**4. How many customers does your smallest Member company serve?**

WISPA's smallest member company has one customer. WISPA has 144 Members with fewer than 100 customers.