NARRATIVE STATEMENT OF MOUNTAIN TELECOMMUNICATIONS INC IN SUPPORT OF APPLICATION FOR RENEWAL OF EXPERIMENTAL LICENSE WD2XMB

The applicant, Mountain Telecommunications, Inc., seeks by this application to continue the experimental project currently operating in Cottonwood, Arizona pursuant to the Experimental License for WD2XMB (File No. 0182-EX-PL-2004). The applicant seeks to extend this experiment for an additional 18 months.

1. Current Authorization and Testing

MTI is a local telephone company providing enhanced services throughout the State of Arizona. Under experimental license WD2XMB, MTI has been conducting tests of access BPL services over medium and low voltage power lines utilizing the Mitsubishi Equipment at locations in Cottonwood, Arizona. MTI has been working with Mitsubishi and APS, Arizona's largest and longest-serving electrical utility, to test and develop the Mitsubishi Equipment, test consumer acceptance, compliance with FCC emissions requirements and coordination with local radio users such as the amateur radio operators.

2. Justification for Renewal

The experiment has been very useful in allowing MTI and APS to develop system deployment and operations information to support commercial scale deployments of access BPL. In addition, the Cottonwood test bed has been invaluable to Mitsubishi, providing a means for testing its system designs in an operational setting. In addition, the Cottonwood experiment has provided the participants with significant experience and information used to develop interference avoidance and mitigation techniques (e.g. frequency notching and signal attenuation) to prevent harmful interference with local radio users. Further work is necessary, however.

As the applicant and its partners prepare to move into a larger scale deployment phase (for which the applicant will seek the appropriate additional authority) of access BPL testing, the availability of a test bed for configuration and deployment testing will be critically important. Cottonwood would serve as that test bed. Moreover, the Cottonwood platform also would serve a similar test bed role as Mitsubishi continues to fine-tune its equipment in preparation for full FCC certification testing. Thus, the Cottonwood experiment continues to be important in the final stages of testing necessary for full commercial deployment of the Mitsubishi equipment.

In addition, the applicant seeks to continue its coordination work with the local amateur radio users in Cottonwood. MTI has developed a sound working approach with the local amateur radio users group in order to ensure that as the Mitsubishi equipment is further refined in preparation for final testing and commercial deployment, it will be able to mitigate any potential harm to amateur radio operators. This activity is a critical aspect of MTI's deployment efforts for access BPL.

3. Conclusion

As the Commission has recognized,[1] access BPL is an important technology for providing broadband services to those that might not have access to such services, as well as provided solid competition for such services in areas that have access. Consumers certainly will benefit where they otherwise could not get service, and the benefit to consumers of increased competition is well known to the Commission. Grant of this application will serve the goals of the Commission as stated in the Report and Order, and will help to ensure the availability of this important new technology for delivery of

[1] Access Broadband Power Line Systems, Report and order (FCC 04-245), in ET Docket No. 04-37/04-104 (released October 28, 2004).

broadband services to consumers as the applicant moves into the final experimental stages of its effort and prepares for commercial deployment.