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JUN 29 2006

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June 23, 2006

JUN 23 2006

Federal Communications Commission
Office of Secretary

By Hand Delivery

Marlene H. Dortch, Esquire

Secretary

Federal Communications Commission

445 12th Street, S.W. – TW-B204

Washington, DC 20554

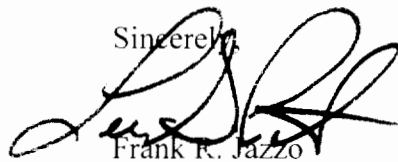
RE: Petition to Deny Applications for Special Temporary Authority
File Nos. 0457-EX-ST-2006 and 0464-EX-ST-2006
Neptuno Media, Application

Dear Ms. Dortch:

Transmitted herewith is an original and four copies of a Petition to Deny the above-referenced Requests for Special Temporary Authority of Neptuno Media, filed by Islandet, Inc.

Should there be any questions regarding this matter, please contact undersigned counsel.

Sincerely,



Frank R. Jazzo

Lee G. Petro

Counsel for Islandet, Inc.

Enclosures

cc: Julius P. Knapp, Deputy Chief
James R. Burtle, Experimental Licensing Branch Chief
Office of Engineering and Technology – by email

Mr. Jose Juan Robles Estrella,
Neptuno Media – by First Class Mail

Marlene H. Dortch, Esquire

June 23, 2006

Page 2

bcc: Mr. Gary Lasher
Mr. Scott Gold
Islanet, Inc.

Frank Jazzo, Esquire

Client #: 15107-01

File: Islanet - #4

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**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

RECEIVED

JUN 23 2006

Federal Communications Commission
Office of Secretary

In the Matter of:

Neptuno Media

File No. 0457-EX-ST-2006

File No. 0464-EX-ST-2006

Request for Special Temporary Authority

**To: Office of the Secretary
Attn: Experimental Licensing Branch
Office of Engineering and Technology**

PETITION TO DENY

Islanet, Inc. ("Islanet"), by and through its attorneys, hereby submits this Petition to Deny relating to the above-referenced Requests for Special Temporary Authority filed by Neptuno Media ("Neptuno") on June 19, 2006 (the "Requests"). In the Requests, Neptuno discloses that it has been notified by the Commission that its current operation of equipment in the 5.150 to 5.250 GHz band is impermissible, and requests temporary authority to continue operation of such devices on an "experimental" basis while it comes into compliance with the Commission's rules.

As discussed in more detail below, the Requests must be denied. First, the information contained in the Requests is false, and there is a real risk of impermissible interference to vital aviation services located in close proximity to the site specified in the Requests. Second, and perhaps more important, is the fact that the impermissible use of the spectrum disclosed by Neptuno in the Requests is not an isolated incident, or a case of a simple mistake. Instead, it represents one small aspect of Neptuno's systematic evisceration of the Commission's spectrum assignment rules and policies in the 5 GHz band. As provided in other documents submitted to

the Commission. Islanet has uncovered and documented Neptuno's comprehensive use of spectrum in the 5 GHz band which represents a wanton and reckless disregard for the Commission's rules and policies. In light of these considerations, the Requests must be denied. Further, in light of the admissions of Neptuno that it has been using the 5.150 to 5.250 GHz band impermissibly, this matter should be referred to the Enforcement Division for further investigation and sanctions.

DISCUSSION

As discussed in the Requests, Neptuno has been notified by the Commission that it is impermissibly using the 5.150 to 5.250 GHz spectrum. Rather than using this band for ISM purposes on an indoor basis, Neptuno discloses that it has been using this spectrum for its network which was supposed to be operating in accordance with the "U-NII band and ISM band specifications."¹ As a result, Neptuno seeks authority to continue to operate in violation of the Commission's rules for a period of six months "to make the proper arrangements to accomplish the frequency change."

1. **The Requests Fail To Provide A Justification For the Continued Flagrant Violations of the Commission's Rules.**

Essentially, the Requests seek to "paper over" Neptuno's past and continuing violations of the Commission's rules by obtaining authority to operate up to 1200 units in the 5.150 to 5.250 GHz band within an 8 kilometer radius of the site specified in the Requests. However, the Requests are void of any explanation as to why this operation qualifies as "experimental" and why it should not be required to immediately cease operations of the violating unauthorized equipment.

¹ Requests, pg. 1 (Explanation).

Moreover, the information provided by Neptuno in the Requests is plainly false. First, Neptuno certifies under penalty of perjury that the distance to the nearest aircraft landing area is 12 kilometers from the site specified in the Requests. However, as shown in Exhibit One, the Isla Grand Airport is actually located only 4.5 kilometers away, and the San Juan Airport is located 10 kilometers away. In addition, several aircraft radar and sensing installations are located in close proximity to the site specified in the Requests, which could suffer interference from Neptuno's offending and illegal operations in this spectral band.

Specifically, there are two radio transmitters – PATTY and CONDO – which are part of the instrument landing systems ("ILS") for the San Juan Airport, and are both located within 3 kilometers of Neptuno's site, and the middle marker for the San Juan Airport is located 8.7 kilometers from Neptuno's transmitter site. Finally, Neptuno fails to provide any detailed analysis as to how its operation would be shielded from aircraft. Instead, it merely recites the examples provided in the Application.²

Therefore, just from a review of the information provided in the Requests, it is clear that Neptuno has failed to justify its continued illegal operations. It has falsely certified that no aircraft will be affected by the operation, when it is clear that there is an airport located within 5 kilometers from its transmitter site, and it has failed to consider ILS and NDB equipment which may suffer interference from its operations.

More fundamentally, Neptuno has failed to demonstrate why special temporary authority for this "experimental" operation is justified in the instant case. As disclosed in the Requests, the sole purpose for filing the Requests was to permit the continued operations while it finally brings itself into compliance with the Commission's rules. There is nothing "experimental" about this

² *Id.*, Question 6(d).

purpose. In fact, the Office of Engineering and Technology has stated that Experimental Licenses, and special temporary authority for such licenses, are appropriate where:

The experimental radio service provides the opportunity to experiment with new techniques or new services prior to submitting proposals to the FCC to change its rules...In addition to the form, the applicant must include a narrative statement describing in detail the proposed experiment, its specific objectives, and its contribution to the development of the radio art.³

Nowhere in the Requests does Neptuno attempt to demonstrate that new techniques or new services will be tested or developed, or how the continued operation of its facilities will contribute “to the development of the radio art.” Nor does Neptuno seek a waiver of the Commission’s rules to permit such operations.

Finally, Neptuno seeks to receive “experimental” authority to continue to operate 1200 devices. As noted above, the experimental radio service is not intended to permit the large-scale usage of spectrum for on-going commercial concern. Neptuno’s only reason for submitting the Requests is because the FCC discovered their illegal use of the spectrum, and Neptuno is attempting to avoid the immediate cessation of services on this frequency purely for its own pecuniary gain. Clearly, this is not a valid justification for the grant of the Requests under the Commission’s experimental radio service rules.

2. Neptuno’s Disclosed Use of the 5.150-5.250 GHz Band Is The Tip of Iceberg of Unauthorized Use of Spectrum.

Just as important, though, is the fact that Neptuno’s admitted impermissible operations discussed in the Requests are just the tip of the iceberg. Islandnet has spent the past two months preparing detailed studies of Neptuno’s operations, and has clear evidence that Neptuno has knowingly, willfully, and unlawfully used the 5 GHz band for unauthorized operations.

³ Experimental License Frequently Asked Questions, located at <http://www.fcc.gov/oet/faqs/elbfaqs.html>, last visited June 21, 2006. See also 47 C.F.R § 5.3 (2005), which outlines 10 types of operations for which the submission of an application for an experimental license is appropriate.

Specifically, Islanet commissioned a study prepared by Richard Biby, P.E., to take sample spectrum readings and to prepare a summary of his findings. Mr. Biby's report was included with Islanet's Complaint, which was filed on May 11, 2006. *See Exhibit Two.* Following Mr. Biby's expert analysis, Islanet continued those efforts, and prepared additional studies which were included in a Supplement to the Complaint, which was filed on May 18, 2006, providing additional evidence of Neptuno's impermissible operations. *See Exhibits Three.* The studies prepared by Mr. Biby and Islanet confirmed through spectrum readings and photographic evidence that Neptuno has been illegally operating its wireless services at seven (7) locations.

Finally, concurrent with the submission of this Petition, Neptuno is filing a Further Supplement, which provides additional evidence that Neptuno is operating in violation of the Commission's rules at three other locations on a variety of channels for which such operation has not been approved. *See Exhibit Four.* As discussed therein, at two of the locations, Neptuno is using spectrum within the 5.150 to 5.250 GHz band.

Thus, rather than being an isolated incident resulting from an honest mistake, the impermissible operation in the 5.150 – 5.250 GHz band specified in the Requests is merely one example of Neptuno's systematic effort to eviscerate the Commission's spectrum assignment rules and policies. Instead of granting the Requests, Islanet requests that the Office of Engineering and Technology deny the Requests, and coordinate its efforts with the Enforcement Bureau to ensure that Neptuno immediately ceases its unauthorized and illegal operations.

CONCLUSION

Wherefore, not only has Neptuno Media failed to provide a legally cognizable justification for the grant of authority to continue to operate in an impermissible manner, there is incontrovertible evidence that the operations specified in the Requests are not isolated incidents, but rather represent one small aspect of Neptuno's wanton and reckless disregard for the Commission's rules and policies for its own pecuniary gain.

Islanet, Inc.. respectfully requests that the Requests for Special Temporary Authority filed by Neptuno Media be denied, and that the Office of Engineering and Technology coordinate its efforts with the Enforcement Bureau to impose the immediate cessation of Neptuno's illegal operations and other appropriate sanctions.

Respectfully submitted,

ISLANET, INC.

By: 

Frank R. Jazzo, Esquire

Lee G. Petro, Esquire

FLETCHER, HEALD & HILDRETH, PLC

1300 North 17th Street, 11th Floor

Arlington, Virginia 22209

703-812-0400 – Telephone

703-812-0486 – Telecopier

Its Attorneys

June 23, 2006

Exhibit 1

Aviation Conflicts

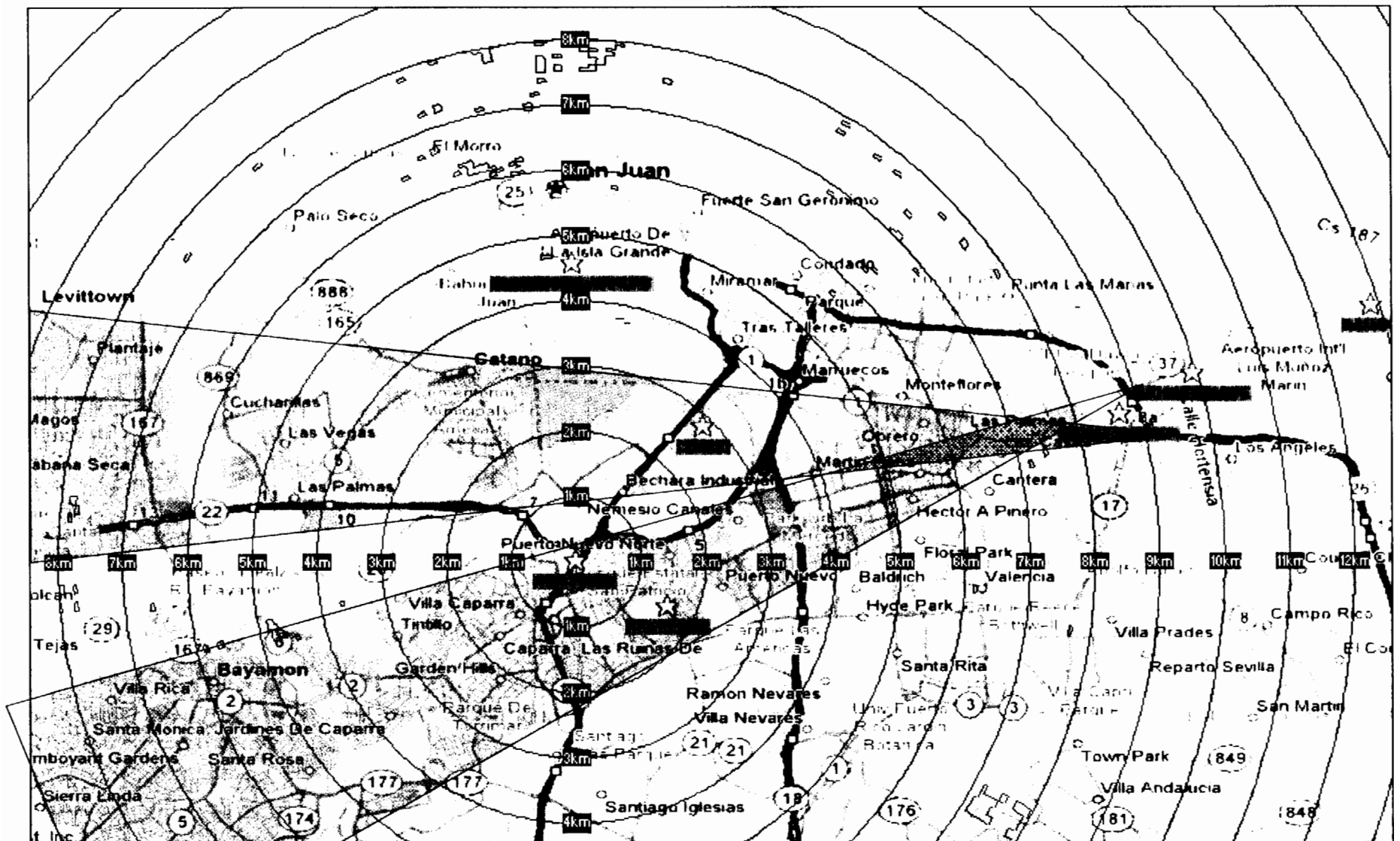


Exhibit 2

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HOWARD M. WEISS

*NOT ADMITTED IN VIRGINIA

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May 11, 2006

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MAY 11 2006

**Federal Communication Commission
Bureau / Office**

By Hand Delivery

Joseph Casey, Chief
Spectrum Enforcement Division
Enforcement Bureau
Federal Communications Commission
445 12th Street, S.W. – TW-B204
Washington, DC 20554

RE: Complaint of Unauthorized Use of Radio Spectrum

Dear Mr. Casey:

Islanet, Inc. ("Islanet"), by and through its attorneys, and pursuant to Section 1.41 of the Commission's rules, hereby submits this Complaint against Neptuno Networks, Inc. ("Neptuno"), for its unauthorized use of the spectrum to provide broadband wireless service in certain portions of the 5 GHz band.

As discussed herein, Neptuno is using spectrum in portions of the 5 GHz band for which unlicensed operation is not authorized, and apparently has illegally modified transmission equipment to operate in portions of the 5 GHz band for which equipment certification has yet to be issued by the Commission. An investigation has revealed wide-spread illegal use of the 5 GHz band in Puerto Rico by Neptuno, and such use is potentially harmfully interfering with other protected operators which occupy portions of the band, including sensitive U.S. Government radar installations involved with national security.

In light of the information provided below, Islanet respectfully requests that the Commission immediately order Neptuno to cease all operations, and conduct a thorough investigation into the business operations of Neptuno to determine the scope of its illegal use of the spectrum.

DISCUSSION

Islanet has been providing broadband services to business customers in Puerto Rico for more than 10 years. Recently, it obtained the rights to construct a new wireless broadband network utilizing leased spectrum in the 2.5 GHz band.

Joseph Casey, Chief
Spectrum Enforcement Division
May 11, 2006
Page 2

While Neptuno claims that it operates in the unlicensed U-NII bands (5.25-5.35 GHz and 5.725-5.825 GHz),¹ Islanet believes that Neptuno is also operating in other portions of the 5 GHz band for which unlicensed operations is not currently authorized. Such operations outside the authorized band are a direct violation of Section 301 of the Communications Act and Part 15, Subpart E of the Commission's rules.

Specifically, Islanet commissioned Richard P. Biby, P.E., of Waterford Consultants, LLC, to prepare an Engineering Statement (the "Statement"), attached hereto as Exhibit B, that provides evidence that Neptuno is operating in the 5.350 – 5.470, 5.830 – 5.925, and 5.925 – 6.425 GHz bands, in which the Commission has not authorized unlicensed use,² along with the 5.470-5.725 GHz band, in which the Commission has not yet certified equipment to operate. In particular, the Statement lists 13 different frequencies on which Neptuno apparently was operating on April 24, 2006, and April 25, 2006. The Report details the steps taken by Mr. Biby to verify the origination of the transmissions specified therein, and provides photographic evidence as to the apparent ownership of the transmission devices.

For example, the Report indicates that a transmission device was operating on 5.707 GHz, and is located at Western Bank Place, San Juan. According to the photographs taken at that site, the transmission device was installed on a mast that had an identifying sticker listing "Neptuno Networks." *See Statement*, Photos 1 & 2.

In addition, at the First Bank Building in San Juan, Mr. Biby determined that a Neptuno Networks transmitter was operating on 5.424 GHz and 5.685 GHz. Attached as Exhibit 3 is the back of this device, which shows an FCC ID of OJBAB-ACCESS-SU02, and that it was manufactured by Axxcelera Broadband Wireless, Inc ("Axxcelera").

Attached hereto as Exhibit C is a list of the FCC IDs issued by the Commission to Axxcelera, and there are three such devices with that FCC ID. However, none of the devices authorized by the Commission are permitted to operate on 5.424 GHz or 5.685 GHz. *See Exhibit C*. Furthermore, at three other locations, Mr. Biby determined that Neptuno Networks transmitters apparently operated on ten different frequencies, none of which are currently authorized for U-NII operations. *See Statement*, Table 1 and Photos 4-7. It is highly likely, then, that Neptuno has used its long-standing use of Axxcelera products, *see Exhibit A*, to its advantage in modifying the equipment to utilize frequencies for which the product was not authorized.

Furthermore, while the Commission did authorize the eventual use of the 5.470-5.725 GHz band for U-NII operations, the Commission required equipment operating in that band to

¹ See Exhibit A.

² See 47 C.F.R. 2.106 (2005).

Joseph Casey, Chief
Spectrum Enforcement Division
May 11, 2006
Page 3

utilize Dynamic Frequency Selection and Transmit Power Control features.³ This was necessary to protect the incumbent government radar installations. To date, the Commission has not yet adopted the final testing procedures adopted in the U-NII Order, and recently sought additional comments on the development of the final testing procedures.⁴ The Commission did adopt interim test procedures in the U-NII Order.⁵

However, as shown in Exhibit D, neither Axxcelera nor Neptuno have filed for or received authorization for such equipment, nor have they filed for an experimental license to operate in the 5 GHz band. Finally, Neptuno does not have a license to operate on any frequencies within the 5 GHz band at the sites identified in the Statement.⁶

CONCLUSION

The unmistakable conclusion that must be reached is that Neptuno Networks is engaged in a whole-scale evisceration of the Commission's licensing and equipment testing regulations to suit their own pecuniary gain. Based on a thorough review of the Commission's database, neither Neptuno nor Axxcelera has received authorization to operate on the 5 GHz band frequencies detailed herein, nor has the Commission authorized either party to develop and operate equipment in the subject areas.

While Neptuno may have simply misunderstood that it was permitted to operate in the newly-authorized U-NII bands without adopting the DFS and TPC features required in the U-NII Order, that does not explain the eight other instances where Neptuno is operating in 5.350-5.470 and 5.830-5.970 GHz bands which are not even set aside for unlicensed U-NII operations. Such operations in the newly-authorized U-NII band threaten sensitive U.S. Government radar installations that were to be protected under the Commission's rules, and Neptuno's operations in the other two bands may cause interference to licensees that were specifically authorized to operate in those bands.

³ See *Revision of Parts 2 and 15 of the Commission's Rules to Permit Unlicensed National Information Infrastructure (U-NII) Devices in the 5 GHz Band*, Report and Order, 18 FCC Rcd 24,484, ¶ 29 (2003) ("U-NII Order").

⁴ See *Office of Engineering and Technology Seeks Additional Comment on Petitions for Reconsideration for Unlicensed National Information Infrastructure Devices*, Public Notice, DA 06-927 (rel. April 26, 2006). See also *Revision of Parts 2 and 15 of the Commission's Rules to Permit Unlicensed National Information Infrastructure (U-NII) Devices in the 5 GHz Band*, Order, 21 FCC Rcd 1816 (2006).

⁵ *U-NII Order*, ¶ 39.

⁶ See Exhibit E. While Neptuno does have a license to operate a common carrier fixed point-to-point microwave facility on 5974.85 MHz, this station is not licensed to operate at any of the five sites referenced in Table I.

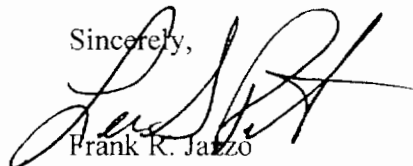
FLETCHER, HEALD & HILDRETH, P.L.C.

Joseph Casey, Chief
Spectrum Enforcement Division
May 11, 2006
Page 4

In light of this information, Islandet, Inc., respectfully requests that the Commission's Spectrum Enforcement Division initiate a full-scale investigation in to the operations of Neptuno Networks and take all necessary steps to immediately cease Neptuno's unauthorized and illegal operations.

Should there be any questions regarding this information, please contact undersigned counsel.

Sincerely,



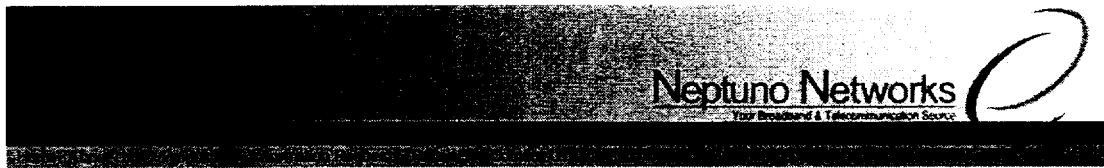
Frank R. Jazzo
Lee G. Petro

Counsel for Islandet, Inc.

Enclosures

cc: Mr. Reuben Jusino, Resident Agent
FCC – San Juan Resident Agent Office – by email

EXHIBIT A



Neptuno and Axxcelera Collaborate to Enable Businesses in Puerto Rico to Thrive Without Wires**Neptuno Networks Brings Advanced Broadband Wireless Technology to 1,000 Businesses in Puerto Rico**

SAN JUAN, PUERTO RICO and SANTA BARBARA, CA -- (MARKET WIRE) -- 10/11/2005 -- Neptuno Networks Inc., the largest wireless ISP in Puerto Rico, announced today that it has reached another milestone: that of providing broadband wireless service to 1,000 business customers in Puerto Rico. Mr. Pedro Andres, President and CEO of Neptuno Networks, stated that "This explosive growth in our business customer base can be attributed to the high level of customer service that we consistently provide, coupled with state of the art AB-Access™ product line from Axxcelera." Axxcelera Broadband Wireless, a Moseley Wireless Solutions Group Company, is a recognized leader providing broadband wireless communications products and technologies. Neptuno has grown its customer base from 100 to over 1,000 business customers in just three years, spanning the industries of banking, insurance, government agencies, law and accounting firms, retail establishments, and major multinational companies in Puerto Rico. "We are pleased to be a part of the tremendous success of Neptuno Networks and to see that our products have helped Neptuno achieve its business goals and enabled their customers to reap the benefits of dependable wireless broadband services," said Jerry Kollmann, Senior Vice President -- Worldwide Sales, Marketing and Customer Support for Axxcelera Broadband Wireless.

Axxcelera's AB-Access platform operates in the unlicensed U-NII bands (5.25-5.35GHz and 5.725-5.825GHz) supporting a variety of bandwidths, industry standard interfaces and multiple customer premises equipment (CPE) options. As business and residential customers' demand for capacity and functionality increases within their wireless networks, the AB-Access provides an ability to allow service providers to provision and configure uniquely customized applications. "The AB-Access platform product configurations allow customers/operators to offer lower cost CPEs and unique customized solutions that are cost and functionally competitive with offers from DSL and cable operators," added Kollmann.

About Neptuno Networks

Neptuno Networks, Inc., based in Puerto Rico, is a telecommunications and broadband systems integration service company offering the most advanced technology in wireless broadband systems. Neptuno Networks focuses on each client's specific needs to develop innovative, customized solutions. Neptuno's wide-ranging portfolio of services help customers build a solid business infrastructure and contribute to every stage of a customer's networking project.

About Axxcelera Broadband Wireless

Axxcelera Broadband Wireless develops technology for the deployment of broadband wireless communications. Its fixed broadband wireless platforms bridge the last mile, replacing the local loop for corporate branch office and small business subscribers. Utilizing innovative packet-on-demand technology, these systems provide the capability for voice, real-time video conferencing, web-surfing, and transmission of full streaming video and data files, simultaneously over a single connection. Headquartered in Santa Barbara, California, Axxcelera is wholly owned by Moseley Wireless Solutions Group Company, a leading designer, manufacturer, and marketer of electronic communications equipment for diversified global telecommunication and broadcast industries.

For more information please contact:

Axxcelera Broadband Wireles

Mr. Pedro Andrés - CEO
(787) 777-0018

Axxcelera Broadband Wireles

Mr. Jerry Kollmann
(480) 820-927

[Back to Home](#)

EXHIBIT B

Engineering Statement in Re:
Non Compliant WISP Operators
San Juan, PR and Nearby Sites

Islandet, Inc.

May 10, 2006

Engineering Statement in Re:
Non Compliant WISP Operators
San Juan, PR and Nearby Sites

Islanet, Inc.

Overview

A commercial Wireless Internet Service Provider ("WISP") learned that a competing service provider appeared to be using frequencies not available under Part 15 of the FCC rules. As this would give the competing service provider an unfair competitive advantage (using frequencies essentially free from interference, as all unlicensed operators have to contend with), Waterford Consultants, LLC was retained to explore the inappropriate usage.

On April 24 and 25, 2006, Richard P. Biby, P.E. traveled to Puerto Rico to conduct field measurements and document any improper frequency usage.

Equipment

A Anritsu MS2721A portable Spectrum Analyzer was used to record frequency occupancy. The Spectrum Analyzer was serial Number 545052, last calibrated on November 8th, 2005. Calibration is due November 8th, 2006.

A LPA-6000 directional Log Periodic antenna was used with a frequency range of 2100 to 6000 MHz, providing approximately 5.0 dB of gain, with a highly directional pattern and a high front to back ratio. A 20' low loss coaxial cable was used to allow for pointing of the antenna. As absolute signal strength is not the subject of this project, no attempt was made to accurately determine line loss or antenna gain.

Field Results

The attached Table 1, Improper Frequencies in Use, documents the results of visits to five sites in and near San Juan. All frequency references are to the low end of the occupied channel.

Additional signals were found at the sites, both from multiple WISPs, and those signals which were identified to be operating within part 15 rules are not identified in the table.

All signals identified appear to have a band width and modulation characteristic consistent with the 802.11 standard, approximately 20 MHz wide. Additionally all signals listed in Table 1 were sufficiently strong as to verify their transmission from the immediate site.

At all the sites visited, simple visual inspections could be made to associate antennas with equipment racks. Photo 1 and Photo 2 show the visible identifying Neptuno Network's equipment installed at site 1. Photo 3 is a close up of the identifying transmitter information at site 2 (apparently the same transmitter as used at site 1). Moreover, at most sites there were only two WISP operators and, with the directional antenna, association of the frequency and operator were easily matched.

Conclusion

From the gathered data, and in the opinion of the below signed Professional Engineer, that there is substantial evidence that Neptuno is operating in spectrum not allowed under the FCC Rules and Regulations. It further appears that these operations are widespread, not limited to a single location.

Additionally, as visual inspection of the installations indicate that the equipment has not recently been installed (it appears to be 18 months or older, some substantially older), it is unlikely that Neptuno unintentionally used equipment recently made available for new Part 15, WISP operations. As most WISP equipment allows the user to choose which country's unlicensed spectrum to use, it can only be concluded that Neptuno intentionally choose to use spectrum inconsistent with US and FCC rules and regulations.

Certification

Under penalty of perjury, I state that the above is true and correct to the best of my knowledge and belief.



A handwritten signature in black ink, appearing to read "Richard P. Biby", written over a horizontal line.

May 10, 2006

Richard P. Biby

Registered Professional Engineer

Commonwealth of Virginia Reg. No. 0402-026132

Table 1 Improper Frequencies in Use

Site No.	Date of Visit	Site Name Frequency (GHz)	Coordinates / Proper Use
Site 1	April 24, 2006, PM 3:30	Western Bank Place 5.707	N18-25-27 W66-0330 Future UNII
Site 2	April 24, 2006, 4:50PM	First Bank Building 5.424 5.685	N18-26-42 W66-04-00 ARNS, Radio Location, EESS Future UNII
Site 3	April 25, 2006, 9:20 AM	Cerro Pina 5.366 5.590 5.570 5.650 5.900 5.940 5.970	N18-09-09 W66-04-49 ARNS, Radio Location, EESS Future UNII Future UNII Future UNII ISM, Amateur, Private Land Mobile, Personal Radio International Fixed, Satellite, Fixed Microwave International Fixed, Satellite, Fixed Microwave
Site 4	April 25, 2006, 10:45 AM	Gurabo 5.870 5.350	N18-16-54 W65-56-37 ISM, Amateur, Private Land Mobile, Personal Radio ARNS, Radio Location, EESS
Site 5	April 25, 2006, 1:00 PM	Capital Center 5.850	N18-25-34 W66-03-51 ISM, Amateur, Private Land Mobil, Personal Radio

Photographs



Photo 1 Neptuno Networks Mast, Site 1



Photo 2 – Neptuno Networks ID on Mast shown in Photo 1



Photo 3 – Back of Apparent Neptuno Networks Antenna at Site 2



Photo 4 – Neptuno Networks cabinet at Site 3 Cerro Pina



Photo 5 Neptuno Networks Antennas (and others) at Site 3 Cerro Pina



Photo 6 Apparent Neptuno Networks Antennas (between two upper microwave dishes) at
Site 4 Gurabo

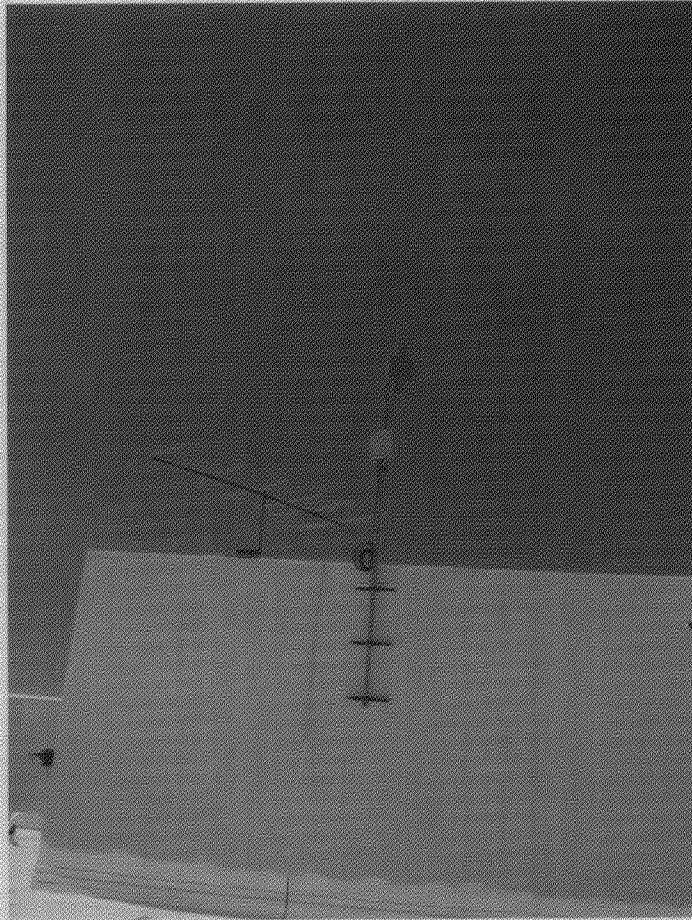


Photo 7 Apparent Neptuno Networks Antennas at Site 5 Capital Center