



WASHINGTON, DC

STEPHEN E. CORAN
202.416.6744
SCORAN@LERMANSENTER.COM

May 9, 2019

Marlene H. Dortch, Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, D.C. 20554

Re: ***Request for Waiver of the Citizens Broadband Radio Service Transition
Deadline
WT Docket No. 18-353
Notice of Ex Parte Communications***

Dear Ms. Dortch:

On behalf of the Wireless Internet Service Providers Association (“WISPA”), on May 8, 2019 the undersigned met in separate meetings with (1) Will Adams, legal advisor to Commissioner Brendan Carr, (2) Umair Javed, legal advisor to Commissioner Jessica Rosenworcel, and (3) Julius Knapp, Aspasia Paroutsas, Ira Keltz, Rashmi Doshi, Axel Rodriguez and Corey Cahill of the Office of Engineering and Technology.¹ The purpose of the meeting was to discuss the pending Petition for Waiver of Sections 90.1307 (c) and (d) and Sections 90.1338(a) and (b) of the Commission’s Rules (“Petition”) filed jointly by WISPA and the Utilities Technology Council (“UTC”) on October 4, 2018.²

At each meeting, we discussed the status of the Petition and the specific points presented in WISPA’s recent ex parte letter providing additional grounds for grant of a blanket waiver of the CBRS transition rules.³ In sum, it was explained that the time remaining before the end of the transition period in April 2020 is insufficient for small fixed wireless broadband providers given the need to certify CPE-CBSDs, build up the supply chain, schedule tower-climbing crews

¹ Messrs. Doshi, Rodriguez and Cahill participated by telephone.

² *Public Notice*, Wireless Telecommunications Bureau Seeks Comment on Wireless Internet Service Providers Association and Utilities Technology Council Request for Waiver of the Citizens Broadband Radio Service Transition Deadline, DA 18-1206, WT Docket No. 18-353 (rel. Nov. 27, 2018).

³ Letter from Stephen E. Coran, Counsel to WISPA, to Marlene H. Dortch, FCC Secretary, WT Docket No. 18-353 (filed May 3, 2018). A copy is attached for convenience.



Marlene H. Dortch, Secretary

May 9, 2019

Page 2

and technicians, comply with certified professional installation procedures, and register with the Spectrum Access System (“SAS”) and Environmental Sensing Capability (“ESC”). The results of a recent survey of WISPA members showed that 70 percent of respondents reported that that they would need to replace hardware to accomplish these tasks and would require several months to do so.

In addition, the lack of certified CPE-CBSD could, without express permission from the Commission, prevent fixed wireless broadband providers from participating in Initial Commercial Deployments. The Commission should adopt an order and/or implement a process permitting non-certified CPE-CBSDs to be deployed as part of ICDs, so long as the CPE-CBSD operates under control of a SAS and ESC.

Pursuant to Section 1.1206 of the Commission’s Rules, this letter is being filed in ECFS in the above-referenced docket. Please do not hesitate to contact the undersigned with any questions.

Respectfully submitted,

/s/ Stephen E. Coran
Stephen E. Coran

Enclosure

cc: Will Adams
Umair Javed
Julius Knapp
Aspasia Paroutsas
Ira Keltz
Rashmi Doshi
Axel Rodriguez
Corey Cahill