

May 9, 2019

Via ECFS

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: 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 – WT Docket No. 18-353
Notice of Ex Parte Presentation

Dear Ms. Dortch:

Cambium Networks, Ltd. (“Cambium”), submits this *ex parte* letter to support an extension of the April 17, 2020 deadline for existing 3650-3700 MHz licensees with grandfathered wireless protection zones to transition their networks to comply with new Part 96 Citizens Band Radio Service (“CBRS”) rules, consistent with the relief requested in the Waiver Petition filed by the Wireless Internet Service Providers Association (“WISPA”) and the Utilities Technology Council (“UTC”).¹ Cambium agrees that changed circumstances provide good cause for such an extension through January 8, 2023, as WISPA and UTC request, and Cambium urges the FCC to grant the Waiver Petition.

Cambium builds Wi-Fi and fixed wireless broadband solutions in the 3650-3700 MHz band, among other bands. Cambium supports cost-effective broadband connectivity for point-to-point and point-to-multipoint installations deployed by service providers, enterprises, governmental and military agencies, oil, gas and utility companies, Internet service providers and public safety-first responders. Cambium manufactures equipment that WISPs, utilities, government entities and others that have deployed as part of their substantial investments in the 3650-3700 MHz band. Cambium’s customers have invested heavily in this band, and a smooth transition to new Part 96 is critical for these stakeholders and the public they serve.

In 2015, the FCC adopted its proposal to include the 3650-3700 MHz band within the new 150-megahertz CBRS framework. The FCC provided for a five-year transition period (or through the remainder of the license term, whichever is longer) “in which incumbent 3650-3700 MHz licensees will enjoy interference protections that ease the transition to the new rules.”² This transition period was chosen in part to give existing licensees sufficient time and opportunity to modify their operations to the new Part 96 rules, which require deployment of equipment with Spectrum Access System (“SAS”) and Environmental Sensing Capability (“ESC”) capabilities. Although more than four years have passed since the FCC adopted the transition period, as WISPA and UTC note, neither SAS nor ESC were available and operational as of the end of 2018³, and are still not available as of the filing of this *ex parte*

¹ Waiver of Sections 90.1307(c) and (d) and Sections 90.1338(a) and (b) of the Commission’s Rules, WT Docket No. 18-353, Petition for Waiver (filed November 28, 2018)(“Waiver Petition”).

² More specifically, the FCC opted to protect Grandfathered Wireless Broadband Providers licensed on or before January 8, 2013 for the longer of a) five years, or b) the remainder of their license term. *Amendment of the Commission’s Rules with Regard to Commercial Operations in the 3550-3650 MHz Band*; Report and Order and Second Further Notice of Proposed Rulemaking, GN Docket No. 12-254, 30 FCC Rcd 3959, 4073 (adopted April 17, 2015).

³ Waiver Petition at 6. On April 29, 2019, the Wireless Telecommunications Bureau and the Office of Engineering and Technology announced approval of ESC capabilities of CommScope, Federated Wireless, Inc. and Google for the 3.5 GHz Band, but such ESCs “may only be used in conjunction with a fully certified SAS.” *Wireless*

letter. In fact, the first FCC ESC “second stage” certification was issued only last week, but is subject to availability only with a fully certified SAS. Existing licensees have had no control over the delays in rolling out these essential components of CBRS. In addition to delays in equipment availability, the uncertain timing of the resolution of the auctions of Priority Access Licenses (PAL) adds further regulatory uncertainty. Based on recent comments from FCC Commissioner Michael O’Reilly, the PAL auctions will not even occur until well past the initially proposed transition date.⁴

Cambium agrees with WISPA, UTC and others that under these circumstances, existing licensees require additional time to transition their networks and thereby assure continuity of service. Despite extensive multi-stakeholder efforts, equipment certifications for Part 96 equipment have been delayed due to the delay in the development and approval of key aspects of the CBRS. Cambium is nearing completion of product certification in this band, but was also impacted by the recent government shutdown and lack of clarity in certain aspects of the rules by both the FCC and TCB authorities assigned to validate the testing. Cambium is working diligently to ensure that currently deployed systems have a graceful migration path to utilize the CBRS spectrum. These efforts, however, still require significant time and effort on the operator’s part to complete, and without relief from the FCC, operators will have less than a year left to do so. Further, as WISPA and UTC discuss,⁵ proxy controller devices have not been released that would allow existing licensees to retrofit their systems to make them compliant with the Part 96 CBRS rules. Without the timely availability of commercial, certified Part 96 equipment, existing licensees face a quickly shrinking window of opportunity to deploy compliant CBRS services. Instead, such licensees face the prospect that they will be prevented from maintaining long-deployed services for broadband, smart grid and other services.

Rather than needlessly strand such valuable investments and create further uncertainty in the marketplace, the public interest would be better served by granting existing licensees a reasonable extension of time to continue authorized operations as industry efforts continue toward full deployment of CBRS. For these reasons, Cambium urges the FCC to extend the transition deadline to January 8, 2023, as WISPA and UTC have requested.

Please contact the undersigned with any questions.

Respectfully submitted,

/s/ _____
Scott Imhoff
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Telecommunications Bureau and the Office of Engineering and Technology Announce the Approval of Environmental Sensing Capabilities for the 3.5 GHz Band, GN Docket No. 15-319 (rel. Apr. 29, 2019)

⁴ Remarks of FCC Commissioner Michael O’Reilly before the CBRS Alliance, Charlotte, NC (delivered Apr. 30, 2019).

⁵ *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*, Reply Comments of the Wireless Internet Service Providers Association and the Utilities Technology Council at pp 12-13.