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May 24, 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 May 24, 2019, Claude Aiken, President & CEO of the Wireless Internet Service Providers Association (“WISPA”) and undersigned counsel to WISPA met with Matthew Pearl, Paul Powell, Joyce Jones and Becky Schwartz (the latter three by telephone) of the Wireless Telecommunications Bureau 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, 2018.¹

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.² 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 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

¹ *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).

² Letter from Stephen E. Coran, Counsel to WISPA, to Marlene H. Dortch, FCC Secretary, WT Docket No. 18-353 (filed May 3, 2018).



Marlene H. Dortch, Secretary

May 24, 2019

Page 2

they would need to replace hardware to accomplish these tasks and would require several months to do so. We explained that it would be more administratively efficient for both 3650-3700 MHz licensees and Commission staff to grant a blanket waiver for all licensees rather than require individualized waiver requests to be filed, considered individually and acted upon in light of the industry-wide circumstances.

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

cc: Matthew Pearl
Paul Powell
Joyce Jones
Becky Schwartz