December 10, 2018

Concerning FCC Proceedings: 18-353

To: Chief, Wireless Telecommunications Bureau

I am writing as a representative of Bolt Internet Inc., an employee owned company. This letter concerns proposed extension of Part 90 rules.

We are a wireless internet service provider based in Prescott, AZ. Our coverage area is most of Yavapai County, AZ, which consists of 8,128 square miles . We have more than 1100+ subscribers in this area that range from 3 Mbps to 90 Mbps. Our coverage area consists mainly of small towns fewer than 50,000 people. These towns have DSL, cable, satellite, and cell providers. Most of these providers have extensive holes in their service coverage. This is where we are concentrating our efforts to bring quality internet service to those who are under served.

Bolt Internet Inc. received its NN license in May of 2011. Since that time We have invested heavily in Part 90 equipment and have now started installing Part 96 equipment.

We still have a lot of Part 90 equipment in the field that that will need to be hooked to a SAS via a domain proxy or be decommissioned . We have recently been notified that some of the Ubiquity Part 90 equipment may not be upgraded to the Part 96 rule so we will have replace that gear before the deadline.

With the time it has taken for Part 96 rule changes and developing SAS and other technologies to support the new rules just being finalized now. The current deadline is becoming more and more infeasible and we need to look to extend the Part 90 rules to help small businesses such as ours and other wisps to maximize our return on investment on this older gear. It will also allow us to concentrate on more on deploying more of the newer Part 96 equipment before we need to mop up and remove the older non-Part 96 gear. It may also allow Ubiquity to have more time to develop a solution to domain proxy the older Part 90 gear.

Even though there are operating SASes there now the FCC has yet to certify any of them. It also seems that the ESC system has a while to mature. The Part 96 equipment is there, but most are still not certified. At this time Part 96 is not ready to take over for Part 90 any time soon and the official deadline of April 2020 is less than 15 months out. We need more time to implement and test so we can provide stable internet to our customers!

The last thing we need is to switch to the new SAS system in a hurry and find out there is an instability or issue with the system. Once the old rules run out there is no path back and that can kill any small provider.

With this letter Bolt Internet Inc. demonstrates its support of WISPA and UTC Petition of waiver, to extend the rules and protections through January 2023. This should provide us and other stakeholders the time to test migrate and implement part 96 and move forward with faster plans and better coverage while still giving the reliability that our customers require of us.

Sincerely,

Robert W. Clark

Network Administrator / Partner

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