



December 12, 2018

To Whom It May Concern:

I am writing on behalf of our company Arbuckle Communications, LLC regarding our support of the Petition asking the FCC to extend the transition deadline to January 8, 2023.

We are a Telecommunications Provider located in Southern Oklahoma that has been deeply rooted in our communities since we were originally founded in 1931. We currently serve several thousand Business and Residential customers in our Market that spans over 11,000 square miles. We provide High-Speed Internet Service, Residential Phone Services, Business Telephone Systems, and Business Phone Services. We have a current staff of 20 employees.

Our company was one of the early adopters of the 3650-3700 MHz band and we were granted our license from the FCC on January 19, 2011. Since that time, we have utilized this 50 MHz to provide voice and data services to consumers that live in very rural and under-served markets. As of December 11, 2018, we are currently using this spectrum to provide last-mile service to 1,360 customers. We actively manage 79 Access Points to provide these services to consumers. Since receiving our license from the FCC in 2011 we have invested nearly one-million dollars of our own capital in this band. We believe that small business can and will continue to play an important role in delivering last-mile service to consumers of the larger broadband industry. We currently provide up to 25/3 unlimited data packages with the ability to provide much faster dedicated connections.

We are hoping that the FCC will rule in favor of the Petition to extend the deadline to January 8th, 2023 for many reasons listed as follows:

1. We need the extra time to make sure that all of our customers have been converted and upgraded to equipment that is CBRS ready and capable. As it stands right now, we are really hoping we are not going to run out of time to get our existing customers transitioned over to CBRS compliant equipment.
2. The expenses and resources that we will be committing to make the switch really needs to be spread out over four years vs one year.
3. Our current equipment is not CBRS ready. While our existing vendor is working towards having their equipment ready for CBRS, it has not happened yet. They need more time to make sure the equipment is going to communicate with the SAS properly and effectively.
4. If the Petition is not accepted, there is a possibility that we will have to turn off Access Points which could cause some businesses or residents to lose their internet connectivity that is provided by our organization. We need the additional time to make sure that this does not happen.

We are constantly upgrading our networks to improve our customers service and experience. We are planning on making every effort to get involved in the future PAL Auction portion of CBRS. Please make sure to give us the adequate time to make the transition of our existing network and customers over to CBRS by ruling in favor of extending the transition deadline to January, 8, 2023.

Duane Scott Pope

A handwritten signature in black ink, appearing to read 'D. Scott Pope', is written over the printed name.

Network and Operations Officer
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