

December 11,2018

To: Wireless Telecommunications Bureau

**RE: Request for Waiver of CBRS Transition Deadline**

**WT Docket No. 18-353**

KWISP is a small WISP providing fixed wireless broadband service to more than 600 customers in small towns and rural areas in northern Illinois. We have speed tiers up to 25/5 and offer voice service using VoIP.

We were granted an NN license in 2008 and deployed our first commercial service in the 3650 MHz band in 2010. We now have 22 APs in this band at 11 tower sites serving 100 customers, which we plan to transition to CBRS. One of these APs is a WiMAX basestation that is not CBRS compatible. The other equipment is from Cambium Networks and they say it will be upgradable to CBRS via firmware upgrades and a SAS proxy. We have continued deploying this equipment in reliance on an assumption that we can transition it to CBRS when the time comes.

We also had 5 point-to-point links using legacy 3650 MHz equipment. Our plan is to move these to other bands, one has already been replaced with an 11 GHz Part 101 link.

KWISP may be small, but we provide service to rural customers who don’t have other good broadband options. As a local company, we also create jobs in the community we serve. We cater to our rural customers with networking services to connect their shop buildings, grain driers, feed mills, solar generation systems, and security cameras.

We have run out of 5 GHz spectrum in much of our area (which has several other WISPs), and 3650 MHz allowed us to expand with fast, reliable service, avoiding the interference issues we run into in 5 GHz. 900 MHz and 2.4 GHz bands are no longer usable for us due to smartgrid and WiFi interference, and we replaced our 2.4 GHz networks with 3650 MHz.

In 2015, the transition period to CBRS was set at 5 years, ending in April 2020. Our NN license was originally granted in 2008 and was due for renewal in 2018, but when we renewed it, the new expiration date was set to April 17, 2020 to coincide with the end of the transition period. Normally the renewed license would have been good for another 10 years.

5 years should have been plenty for us to transition our network and avoid disruption to customers. But 5 years has turned into 1 year because none of the pieces to start transition are ready yet. Basically the start date has slipped but the end date has stayed the same.

We need the Cambium equipment (both AP and CPE) to be Part 96 certified, we need the new firmware and the SAS proxy to be available, we need to trial and procure any new hardware and firmware, we need to sign up with a SAS vendor, and we need professional installer training and certification. We can’t start any of those things yet, although it looks like they may be ready by 1Q 2019.

The outdoor infrastructure season here in northern Illinois is May to November. Normally we plan and procure equipment during the winter and install it during the good weather. As a small company, and anticipating some vendor issues, we are probably not going to be able to get our entire network transitioned in one season, given that we are not able to even do the planning and procurement yet. In parallel, we will also need to transition 3 point-to-point links to Part 101 spectrum in time for the CBRS deadline. This process is well known, but will draw on the same budget and construction resources.

It is not looking like we can complete our transition work by the end of the 2019 construction season, which means we won’t be ready by the April 2020 deadline and will have to turn off service to some customers. For this reason, we request a waiver extending the deadline at least another year to 2021. Given that some licenses don’t expire until 2023, the proposal from WISPA and UTC to extend all licenses to the same date, January 2023, seems logical.

KWISP therefore supports the WISPA/UTC waiver request. Licenses that had expiration dates set to April 17, 2020 but otherwise would have expired later could be automatically extended, or a process could be put in place to request extensions, or perhaps a waiver could extend the license periods without actually modifying the licenses. Whatever process you think best, we just need more time.

As a final note, let me emphasize that our situation is a little different from a service provider that might be looking to deploy new commercial service using CBRS spectrum, or a mobile provider looking for additional capacity via carrier aggregation. We are currently using the 3650-3700 MHz band to provide commercial fixed wireless service to rural customers, and have been doing so for 8 years. We are not using it for carrier aggregation, this is the primary and only spectrum for this service. If we lose access to this spectrum before we can transition our network, we will have to shut off customers.

Please find a way to extend the transition and existing NN licenses to the January 2023 date proposed in the waiver request. At a minimum, give us an additional year to 2021 so that we have 2 construction seasons to plan, budget, trial, procure and deploy the equipment; select and implement a SAS; and complete installer training and certification.

Regards,

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