

Veopoint Internet  
PO Box 272127  
Houston TX 77277

December 12, 2018

Federal Communications Commission  
445 12th Street, SW  
Washington, D.C. 20554

Re: Docket No. 18-353 - Citizens Broadband Radio Service - **Comments regarding Petition for Waiver**

Dear FCC:

**Please extend the deadline to January 8, 2023** for the transition of existing Part 90 operations in the 3650-3700 MHz band to the new Part 96 Citizens Broadband Radio Service (CBRS) rules.

We support the **request for extension of the deadline to January 8, 2023** that was submitted in the PETITION FOR WAIVER by The Wireless Internet Service Providers Association ("WISPA") and the Utilities Technology Council ("UTC"), pursuant to Section 1.925(b)(3) of the Commission's Rules, which respectfully requests waiver of Sections 90.1307(c) and (d) and Sections 90.1338(a) and (b) (collectively, the "Transition Rules").

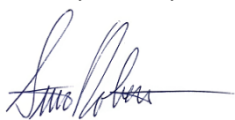
This requested extension of the deadline is absolutely necessary to afford existing 3650-3700 MHz licensees operating in the 3650-3700 MHz band time to complete the transition of their operations to the Part 96 Citizens Broadband Radio Service ("CBRS") rules.

We are a small Wireless Internet service provider (WISP) in operation for 13 years now with 400 subscribers in rural Northeast Texas (see map below). Our customers have little or no other choice but our service. We've spent \$750,000 over the past 5 years on the 3650-3700 MHz band. We provide 3, 6 and 10 Mbps download speeds.

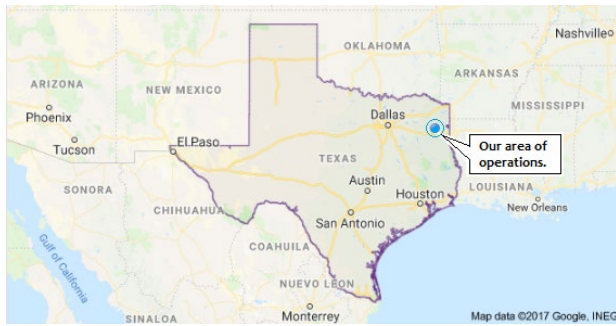
Our goal is to spend another \$650,000 over the next 3+ years transitioning to the new Part 96 Citizens Broadband Radio Service (CBRS) rules but **we cannot do this as quickly as the proposed April 17, 2020 deadline. This is simply not enough time for us to collect funding, procure new infrastructure and implement resources.**

**Please extend the deadline** for the "transition" of existing Part 90 operations in the 3650-3700 MHz band to the new Part 96 Citizens Broadband Radio Service (CBRS) rules **to January 8, 2023.**

Thank you for your consideration of these comments.



-Stuart Robertson



Our coverage area (pictured left) is growing and currently encompasses the following census tracts:

Gregg County- 48183010100, 48183000401 and 48183000200

Harrison County- 48203020200, 48203020605, 48203020606, 48203020603 and 48203020604

Upshur County- 48459950700 and 48459950100