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Wireless Telecommunications Bureau  
Federal Communications Commission  
445 12<sup>th</sup> St., S.W. Washington, D.C. 20554

WT Docket 18-353

BPS Networks is writing in support of the petition by the Wireless Internet Service Providers Association to extend the licenses and deadline for the transition of Part 90, subpart Z operations until January 8, 2023 for existing operators.

BPS Networks is a locally owned and operated Internet Service Provider located in Southeast Missouri providing service to Southeast Missouri and Northeast Arkansas residents. We currently utilize a wide range of technologies, including equipment operating in the 3.65Ghz Part 90 band to provide fast reliable internet service to rural customers.

Delays both regulatory and technical in nature, have left a very narrow albeit insufficient time frame for a smooth transition to CBRS certified equipment. Manufacturers are just now getting certification and a proxy system to allow legacy 3650-3700 MHz to continue to operate however; it is not in place. Many small providers such BPS Networks will face both financial burdens and staffing difficulties if forced to replace their existing equipment in such a short time frame. Therefore, BPS Networks supports the WISPA and UTC waiver petition and urges the FCC to extend the deadline for transition to January 8, 2023 for existing operators.

Respectfully,

Robert Haas  
Network Administrator  
BPS Networks