To: Federal Communications Commission

Re: Docket No. 18-353

Mobilcomm, Inc dba Heavenwire is a small Wireless Internet Service Provider (WISP) in South West Ohio, north of the Cincinnati area. After being founded in 2005 we have always pushed to offer customers lower cost services than what is otherwise available. For most of our customers, the only other option is Satellite for Internet service. To this day we still offer a package at 2 Mbps for those who do not need multimedia but rather need to communicate through the Internet and we are able to provide up to 30 Mbps at some of our 36 tower sites. Most of customers are on the 3 Mbps package while some are going with 10 Mbps. Our biggest offering is the truly unlimited data.

The options we have to be able to be cost effective are unlicensed or “lightly licensed”. 900 MHz was ruined for us years ago due to the high noise floor. 2.4 GHz has been increasingly harder year after year, again due to the rising noise floor. We are now starting to deploy some LTE equipment. The customers on this LTE equipment would not have service through us, or anyone else for that matter, if we had not been able to use 3.65. If we are not able to use this band cost effectively, we will lose these customers and they will lose Internet access entirely.

The need to change equipment out would be monumental for a company our size. We still deal with the day to day issues of maintaining the equipment and service before having to replace everything with new hardware. The cost is another massive feat we had not budgeted for, the customers would be impacted with a loss of service as it would take us quite some time (months) to get everyone swapped over to the new equipment. At this point we’ve had to halt any new customers due to what we don’t know will happen to them. There are customers we could service today if we knew they would be able to stay with us through the transition to CBRS. We are not able to buy equipment for future customers that may end up needing to be replaced soon! There are so many unknowns to deal with:

1. Current equipment may or may not fit Part 96 rules. It currently supports Part 90 rules.
2. SAS operation is totally unknown to us. There are no operational databases or services.
3. The requirement of a “Certified Professional Installer” is an unknown cost with an unknown ruleset date.

Our NN license expires 11/19/2019

Mobilcomm, Inc dba Heavenwire supports the extension of the transition deadline as requested in the Petition filed October 4, 2018 by WISPA and UTC.