



e-vergent.com, LLC.
8330 Corporate Drive
Mount Pleasant, WI. 53406

Tuesday, December 12, 2018

Comments Regarding Petition for Waiver - 18-353

E-vergent is a fixed wireless Internet Service Provider serving approximately 3000 rural customers between Milwaukee and Chicago. We offer up to 25Mbps in most areas, and in some areas up to 50Mbps, from our point to multi-point equipment that overwhelmingly operates in the 5GHz and 3GHz spectrum.

Today we are asking you to grant an extension through January 8th, 2023 to allow NN license holders to continue operation as they do today. We have approximately 300 customers using 3650 – 3700MHz equipment. Many of these customers are using equipment that will need to come out of service and be replaced with newer hardware. We have selected a vendor of LTE technology who has said their radios will be able to be certified to operate under Part 96 rules and the SAS but that certification hasn't actually happened yet.

Furthermore there are still a number of components that are still not yet ready such as the SAS, ESC, the guidelines for a Certified Professional Installer, and final certification of radio equipment. We need to purchase and obtain equipment, install tower side and customer side equipment, turn up a connection to the SAS and make sure we have a CPI collecting all of the correct data to file.

We are a small business providing a necessary service to hundreds of customers using 3GHz spectrum. At this point in time with other pieces not ready, the finish line needs to be advanced to keep an appropriate and reasonable window to complete the final steps in the transition. We are afraid that further delays will happen and we will not be able to purchase and perform approximately 300 additional service calls and perform the tower work, along with our normal workload, before the current deadline in approximately 1 year (one summer in Wisconsin and Illinois). If we are unable to complete the transition and we are forced off the air in 2020, we could potentially lose hundreds of customers which would be detrimental to our business but would also be a hardship to the people we would have to deactivate service for.

Due to the regulatory uncertainty over the last few years we significantly paused our expansion efforts with the spectrum. We look forward to continuing operation in the 3GHz band. It has much promise to provide service to customers we cannot reach with 5GHz due to foliage. In summary we support the extension that has been requested in the Petition for Waiver submitted by WISPA and the UTC for the reasons above.

Thank you for your consideration,

Joseph Falaschi
General Manager
e-vergent.com, LLC.