

Texoma Communications, LLC dba TekWav

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December 12, 2018

To: Wireless Telecommunications Bureau

RE: Request for Waiver of CBRS Transition Deadline

WT Docket No. 18-353

Texoma Communications, LLC is a small, local Wireless Internet Service Provider (WISP) based out of Sherman, Texas. We’re about 60 miles North of Dallas, right before you get into Oklahoma. Our focus is servicing the unserved and underserved people of Grayson County. Our County has an estimated population of 131,000 with the towns having an average of around 5,000-15,000 people. While the bigger towns do have Cable and DSL offerings, many households only have Satellite, hot spots, and some WISP offerings.

With over 1200+ subscribers, we provide speeds from 6mbps – 25mbps download with the majority buying our 10mbps service offering. We are mostly a 5GHz network but do use LTE in 3.65GHz as well as 2.5GHz. We have invested more time and energy into the 2.5GHz spectrum due to the uncertainty in the 3.65GHz band due to all the recent rule changes. While the 3.65GHz does offer significant speed advantages over the 2.5GHz band, we are refraining from deploying more equipment in the 3.65GHz band.

With the proposed deadline leaving us only 1 summer construction season to install compliant equipment, this will put a burden on our company. While we do not have significant deployment of 3.65GHz equipment, we are a small company with very limited resources (people and time) and will present a very real hardship on our company. And while we attempt to quickly change out equipment in a narrow window, this will leave no room for us to grow our company and bring on new subscribers. Whereas if we had an extension of the deadline to 2023, as proposed by WISPA/UTC, we could easily handle the changeover to complaint equipment.

By extending the deadline to 2023, this will give equipment manufacturers plenty of time to make sure that their equipment is in full compliance. We are also concerned that since there will be a narrow window to implement compliant equipment, that the equipment manufacturers will rush out not “fully baked” hardware/software. And this does not even guarantee that there will be sufficient amount of equipment in the supply chain since all the WISP operators will be forced to change out their equipment in just the 1 summer construction season.

In addition, by having only 1 summer construction season, this will also put a strain on our cash reserves since we will have to spend tens of thousands of dollars to change out equipment. While not a burden for large companies, for small operators like myself, it could mean that we will have to shut off clients due to not having the money to switch out the equipment. If we could extend the deadline to 2023, this will help spread the equipment cost out over 4 summer construction seasons thereby helping us manage our cashflow better as well as easily working out the equipment changeout jobs.

To recap, if we could have the deadline extended to 2023, this will give us time to plan, budget, trial, procure, and deploy the compliant equipment; select and implement a SAS; and complete the Certified Professional Installer training and certification.

Texoma Communications, LLC supports the extension of the transition deadline as requested in the Petition filed October 4, 2018 by WISPA and UTC.

Sincerely,

Joseph J McGrath II

Owner