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December 12, 2018

Via Electronic Filing

Marlene H. Dortch, Secretary
Federal Communications Commission
445 Twelfth Street, SW
Washington, DC 20554

RE: WISPA/UTC Request for Waiver of CBRS Transition Deadline; WT Docket No. 18-353

Dear Ms. Dortch:

For the reasons stated below, The Community Agency (TCA) supports the WISPA and UTC waiver petition and urges the FCC to extend the transition deadline for existing 3.65 GHz licenses to convert their operations to CBRS through January 8, 2023.

TCA is a Municipal Telecommunications Utility providing service in northwest Iowa. The Company has been providing wireless Internet services since 2005. TCA has made investment in our county to make sure that the citizens of O'Brien County were not left behind when it comes to high-speed Internet service. TCA and the citizens of O'Brien County have paid for this network and have not had any other government funding to build this system. We are proud that we have accomplished this on our own.

TCA is a small provider that has just over 2000 subscribers in rural O'Brien County, Iowa, which is a farming community. TCA has 2,035 Internet customers and 370 of them rely on the 3650-3700 frequency that is spread over seven towers. TCA offers 10/1 Mbps, 15/2 Mbps, and 25/3 Mbps to our wireless customers and up to 1 Gig in our small towns.

Over the years, TCA has invested over \$1 million in equipment and labor to install and upgrade our equipment. TCA plans on the continued use of the 3650-3700 frequency as our customers depend on it for their jobs, education, and entertainment. We also look forward to more spectrum opening up to provide even faster speeds to our customers.

The April 2020 deadline leaves only one summer construction season for grandfathered operations to install compliant equipment. This will impose hardships on TCA because we are a small company with limited staff and are limited on the resources available to us if the deadline is not extended. We will have to complete all the upcoming changes that have not even been



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finalized yet. We will suffer financial hardship, as we would still have to find and build a new network for our customers.

An extension until January 8, 2023, will allow TCA the time to train staff for the new regulations, acquire the capital to implement the opportunities that are coming and deploy them in a manner that will have the least impact on the services to our customers. An extension will ensure that service to existing 3650-3700 MHz will not be interrupted by the expiration of the license before it can be converted to CBRS.

As previously stated, TCA strongly supports the WISPA and UTC waiver petition and urges the FCC to extend the transition deadline for existing 3.65 GHz licenses to convert their operations to CBRS through January 8, 2023.

Sincerely,

D. J. Weber
General Manager