

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
Waiver of Sections 90.1307(c) and (d))	WT Docket No. 18-353
and Sections 90.1338(a) and (b))	
of the Commission's Rules)	

To: Chief, Wireless Telecommunications Bureau

COMMENTS OF CONIFER COMMUNICATIONS, INC.

Conifer Communications (“Conifer”) writes these comments to support the Petition for Waiver filed jointly by the Wireless Internet Service Providers Association and the Utilities Technology Council for the waiver of Sections 90.1307(c) and (d) and Sections 90.1338(a) and (b) (collectively, the "Transition Rules") to afford existing 3650-3700 MHz licensees additional time to transition operations to Part 96 Citizens Broadband Radio Service ("CBRS") rules. Conifer agrees that the Commission should extend the time for which wireless broadband licensees operating in the 3650-3700 MHz band will be protected from harmful interference from CBRS users. To complete the transition of operations to Part 96 rules, the protection period should be extended from April 17, 2020 through January 8, 2023.

Conifer agrees with WISPA’s request for waiver is consistent with the purpose of the Transition Rules, “to establish a date by which Grandfathered Licensees would no longer be afforded Incumbent Access status and thereby lose interference protection over Part 96 GAA users.” See, *Petition for Waiver*, page 5. The CBRS industry has not matured as contemplated by the Commission when it established the Transition Rules. To deliver the promise of CBRS, service providers will need additional time to predict and structure the capital needs of their operations in a marketplace with a competitive supply of compliant Part 96 equipment. The additional time will enable Conifer Communication to budget for and schedule the tasks necessary for full compliance.

Extension of the CBRS transition period through January 8, 2023 will assist development of economical CBRS systems conducive for small, rural operations like ours in the California Central Sierras. Conifer supports Petitioners’ request for waiver of the Transition Rules.

Respectfully submitted,

CONIFER COMMUNICATIONS, INC.