To: Federal Communications Commission

Re: Docket No. 18-353

West Michigan Wireless is a small Wireless Internet Service Provider (WISP) in south western lower Michigan, between Grand Rapids and Kalamazoo..  Since 2004, we have always offered customers lower cost services than what is otherwise available.  For nearly all of our customers, there are no other financially reasonable Internet service options.

The options we have to be able to be cost effective are unlicensed or “lightly licensed”.  900MHz was damaged years ago due to the high noise floor. 2.4GHz has been increasingly harder year after year, again due to the rising noise floor.  Due to the fact that 5GHz has little to no NLOS capability combined with our heavy tree cover, we don't use it for last mile services. We turn down customers every week due to trees in our rural area.  Our only other option is the 3.65GHz range. The customers currently on our 3.65GHz services, would not have service through us, or anyone else for that matter, if we had not been able to use 3.65GHz.  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 issue we had not budgeted for, though we are hopeful it is a software change. The customers would be impacted with a loss of service as it would take us quite some time (weeks or months) to get everyone reinstalled.  At this point we’ve had to halt any new customers in the 3.65GHz bands because we don’t know what will happen to this service. 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 in a position to buy equipment for future customers that may end up needing replaced in a little over a year!  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 rule set date.

When we began using our NN license 10 years ago, we had planned to do several point to point links due to 5GHz congestion between towers and towers to customers.  Our sites are only a few miles from one another and we still struggle to find clean spectrum, even with the outdoor inclusion of the 5.1GHz range, of which we greatly appreciate and desperately needed.

Hopefully, the upcoming rule making for the 5.9GHz band will expand the 5.8GHz ISM band and allow us more options for long range backhauls.

West Michigan Wireless supports the extension of the transition deadline as requested in the Petition filed October 4, 2018 by WISPA and UTC.