To: FCC

The following comments are in support of Docket 18-353 and are in support of the request from the Wireless Internet Service Providers Association and Utilities Technology Council for a waiver of Citizens Broadband Radio Service Transition deadline.

The Arapahoe Telephone Company has been providing telecommunications services since 1904 to rural communities in Nebraska. Atcjet.net, LLC, is a Nebraska Limited Liability Company wholly owned by the Arapahoe Telephone Company. Atcjet.net, LLC, subsequently, throughout the years, has deployed numerous advancements in technology to our customers. Our initial broadband internet service offering was part of a fixed wireless build out that we began in 2000 and has continued to evolve and expand since. Shortly thereafter, we began deploying DSL, cable broadband, and fiber to the premise services. We have utilized many technologies for backhaul and interconnection which include wireless, copper, and fiber. To date, we are serving approximately 3000 customers throughout 40 rural communities in Nebraska with voice, broadband internet access, and video services.

Atcjet.net, LLC, in 2010, applied for and received a radio license – NN 3650-3700MHz from the FCC, to operate wireless gear in the 3.65GHz frequency. The following is our FRN and Call Sign.

FRN: 0004329314

FCC Call Sign: WQLR294

Atcjet.net, LLC, selected and uses RADWIN 3650 – 3700MHz wireless gear and currently has 28 registered locations with well over 500 installed customers providing service to 18 rural Nebraska communities specifically in those frequencies. Several of these locations were made possible, by The State of Nebraska, through a fairly rigorous selection process, where Atcjet.net, LLC, was awarded a broadband access grant. Atcjet.net, LLC, has been anxiously awaiting the Part 96 CBRS rulings. Atcjet.net, LLC, during the FCC’s rule making process, had been made aware that RADWIN 3.65GHz gear was not currently compliant with the SAS system but was not releasing their roadmap until final Part 96 CBRS rulings were clear and defined. It is still unclear to Atcjet.net, LLC, whether RADWIN will become compliant with the new CBRS infrastructure or not.

Atcjet.net, LLC, during all this has not sat idle but has been developing a contingency plan and testing several manufacturer’s that claim to be compliant or will be compliant with the new CBRS rulings. Having said that, this has evolved into quite the financial burden to bare, not to mention the short deadline to become compliant or be shut down. Atcjet.net, LLC, takes these new CBRS rulings very seriously and pleas with the FCC to consider the burden it places on us and to consider a waiver to Part 96, CBRS rulings extending our license through January 8, 2023. Atcjet.net, LLC, operates in the State of Nebraska, which had 100 days in 2017 with subzero weather, with frequent snow and ice storms. If our current deadline of April 6, 2020 was to be enforced, it would be disastrous to the financial stability of Atcjet.net, LLC, and near impossible to accomplish the work load that would be required in the current time frame.

Atcjet.net, LLC, would like to thank the FCC for the opportunity to make these comments and to state our case.

Regards,

Rodney Whipple

V.P. Information Services

Arapahoe Telephone Company

Dba., Atcjet.net, LLC.

PO Box 300

524 Nebraska Ave.

Arapahoe, NE 68922

Bus: 308-962-7298

rwhipple@atcjet.net