Before the
Federal Communications Commission
Washington, DC 20554

In the Matter of	)	
	)	
Amendment of Parts 1, 2, 22, 24, 27, 90	)	WT Docket No. 10-4
and 95 of the Commission's Rules to	)	
Improve Wireless Coverage Through the	)	
Use of Signal Boosters	)	

To: The Commission

REPLY COMMENTS OF THE

TELECOMMUNICATIONS INDUSTRY ASSOCIATION

I. INTRODUCTION AND SUMMARY

The Telecommunications Industry Association (TIA) hereby submits reply comments to the Federal Communications Commission (Commission) in the above captioned proceeding.[1] TIA and its members appreciate the opportunity to provide unique stakeholder comment on the issues raised by the NPRM. As detailed below, TIA believes (1) the record supports TIA's recommendations that any requirement for an automatic shutdown feature in public safety signal boosters is inappropriate, and (2) the examination of proposals on the record are worthwhile, and the Commission should defer to or encourage voluntary consensus-based standardization efforts whenever possible in making determinations of technical parameters.

TIA represents the global information and communications technology (ICT) industry through standards development, advocacy, trade shows, business opportunities, market intelligence and world-wide

[1] *Amendment of Parts 1, 2, 22, 24, 27, 90 and 95 of the Commission's Rules to Improve Wireless Coverage Through the Use of Signal Boosters*, Notice of Proposed Rulemaking, WT Docket No. 10-4, FCC 11-53 (rel. Apr. 6, 2011) (*NPRM*).

environmental regulatory analysis. For over eighty years, TIA has enhanced the business environments for broadband, mobile wireless, information technology, networks, cable, satellite, and unified communications. TIA's 600 member companies' products and services empower communications in every industry and market, including healthcare, education, security, public safety, transportation, government, the military, the environment, and entertainment. TIA is accredited by the American National Standards Institute (ANSI). Furthermore, TIA is able to provide the Commission with the unique perspective of a developer of voluntary industry standards for public safety boosters.[2]

II. THE RECORED DEMONSTRATES THAT THE COMMISSION SHOULD NOT REQUIRE AN AUTOMATIC SHUTDOWN FEATURE IN PUBLIC SAFETY SIGNAL BOOSTERS

As TIA noted in its comment to the NPRM, signal boosters are critical in public safety's efforts to improve signal coverage, and any requirement that public safety boosters automatically shut down if it is determined that the boosters are operating outside of the appropriate technical parameters, would significantly undermine this benefit, because critical communications between emergency personnel would be jeopardized.[3] Instead, TIA proposes that in these circumstances, it would be preferable to allow the malfunctioning booster to continue operating until the Part 90 network operator can identify the source of the problem and fix or replace the booster.

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[2] TIA has developed TIA-156-A, *Land Mobile Radio Antenna Systems Minimum Standards for RF Signal Boosters*, which defines critical specifications, terms and conditions of measurement used in the development and specification of Signal Booster products to be used in Government and Private Radio Systems which includes Public Safety Radio Systems. These requirements make possible a direct comparison of the resulting specifications, eliminating misunderstandings or confusion when comparing products from different manufacturers. The terms, definitions, and conditions of measurement in TIA-156-A allow for typical tests as well as acceptance tests. *See* http://standardsdocuments.tiaonline.org/tia-156-a.htm.

[3] *See* TIA Signal Boosters NPRM Comment at 3-4.

TIA notes that other comments on the record demonstrate support for this principle.[4] From the public safety perspective, it is quite clear that "unauthorized boosters, use of incorrect booster types, and improper booster installation can lead to dangerous interference to critical public safety operations in the same, or adjacent frequency bands." The MWAA notes that "repeaters tend to be monitored in the natural course of carrying out the mission, and automatic shut-down could, in some cases, prove to be a cure worse than the disease."[5] Further, while several commenters lend support to the requirement of an automatic shutdown feature in commercial boosters,[6] which TIA supports,[7] TIA finds no compelling arguments on the record supporting automatic shutdown requirements in public safety boosters. TIA again urges the Commission to recognize the detrimental effect such a requirement on public safety boosters could have, and reiterates that the Commission should not require public safety boosters to automatically shut down.

III. TIA SUPPORTS THE EXAMINATION OF PROPOSALS THAT AVOID OVERBURDENSOME LICENSING AND CERTIFICATION RULES

The Commission's goal of facilitating the development and deployment of well-designed signal boosters will be promoted by avoiding excessive regulatory requirements. As such, TIA is supportive of the examination of the Verizon-Wilson Electronics "Joint Proposal."[8] TIA appreciates the Joint Proposal's efforts to provide clarity and certainty to the type approval process, and to efficiently mitigate instances of

[4] *See, e.g.*, Comments of Bird Technologies Group, WT Docket No. 10-4 (filed Aug. 9, 2011) at 8; Comments of the Metropolitan Washington Airports Authority, WT Docket No. 10-4 (filed Aug. 9, 2011) (MWAA Comments) at 5-6.

[5] MWAA Comments at 6.

[6] Comments of Cellphone-Mate, Inc., WT Docket No. 10-4 (filed Aug. 9, 2011) (Cellphone-Mate Comments) at 5; Comments of CTIA-The Wireless Association, WT Docket No. 10-4 (filed Aug. 9, 2011) at 17; Comments of National Association of Manufacturers and MRFAC, Inc., WT Docket No. 10-4 (filed Aug. 9, 2011) at 5.

[7] TIA Signal Boosters NPRM Comments at 3.

[8] *See* Letter from John T. Scott, III, Andre J. Lachance and Russell D. Lukas to Marlene H. Dortch, WT Docket No. 10-4 (July 25, 2011) (Joint Proposal).

interference. Specifically, the Joint Proposal contains a suggestion that the technical operating specifications of Certified Engineered and Operated (CEO) boosters to be developed by industry participants, including industry trade association, manufacturers, installers, and licensed carriers.[9] TIA believes that in all instances possible, the Commission and the public are best served by deferring to the existing voluntary, consensus-based standardization process when making technical parameter determinations. As noted above, TIA's standard development process has already produced a suite of widely-used signal booster standards, and will continue to be an excellent venue for meeting the emerging needs of the public safety community. This undertaking would also save the Commission untold resources in the creation of these technical criteria,, as well as result in the most accurate reflection of a voluntary, consensus-based determination of the appropriate parameters by the stakeholders who possess the practical knowledge needed. Generally, the Commission should ensure that any regulations adopted do not conflict with existing, widely-used standards, and that future standardization efforts are not discouraged.

In its comments on the NPRM, TIA submitted that given the benefits of signal boosters, such devices should not be subject to overly burdensome licensing and certification rules that would delay their deployment and inhibit efforts to improve signal coverage, and that the process for licensing and certifying these devices should not differ significantly from the process used for handsets and other consumer devices that operate on wireless networks.[10] While supportive of eliminating barriers to the deployment of boosters in general, TIA does not agree with proposals that would not require some form of registration of boosters.[11] The inability to have the location of a booster would hamper efforts to mitigate interference. In support of their argument against registering consumer-oriented signal boosters,

[9] Joint Proposal at Appendix A.

[10] *See* TIA Signal Boosters NPRM Comments at 4.

[11] Cellphone-Mate Comments at 8.

Cellphone-Mate notes that the Commission would have difficulty enforcing the rules, and would overburden the Commission's administrative resources.[12] In TIA's view, this bolsters the argument for permitting that this data be maintained by the licensed carrier, and not a national clearinghouse that would weigh on Commission resources.[13] However, TIA reiterates that the express permission of the licensee also be required for the use of such boosters by consumers.[14]

[12] *Id.*

[13] TIA Signal Boosters NPRM at 5; Joint Proposal at 7-8; MWAA Comments at 5; Comments of CommScope, Inc., WT Docket No. 10-4 (filed Aug. 9, 2011) at 6 ("Rather than imposing a single coordination standard for all carriers, each operator should be allowed to develop its own coordination procedures, consistent with these guidelines.").

[14] TIA Signal Boosters NPRM at 5.

IV. CONCLUSION

For the foregoing reasons, TIA urges the Commission to adopt policies consistent with the recommendations above.

Respectfully submitted,

TELECOMMUNICATIONS INDUSTRY ASSOCIATION

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