

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 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

**COMMENTS
OF THE
ENTERPRISE WIRELESS ALLIANCE**

The Enterprise Wireless Alliance (“EWA” or “Alliance”), in accordance with Section 1.415(a) of the Federal Communications Commission (“FCC” or “Commission”) rules and regulations, respectfully submits the following comments in response to the Further Notice of Proposed Rulemaking in this proceeding.¹ The Commission already has taken significant steps to expand the opportunities for consumers and industrial users to enhance their wireless coverage through the use of signal boosters.² It has endeavored to ensure that such devices will not cause interference to the licensed system under whose authorization they operate, while at the same time facilitating the process for securing the right to deploy them.

The instant FNPRM proposes taking an important, additional step in this area. The recently adopted rules stated that Consumer Signal Boosters could be operated for “personal use” only.³

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, *Order on Reconsideration and Further Notice of Proposed Rulemaking*, WT Docket No. 10-4, 29 FCC Rcd 11563 (rel. Sept. 23, 2014) (“FRPRM”).

² 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, *Report and Order*, WT Docket No. 10-4, 28 FCC Rcd 1663 (2013) (“R&O”).

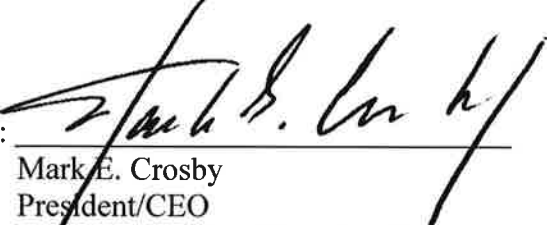
³ 47 C.F.R. § 20.21.

The Commission now has queried whether that limitation is needed for Provider-Specific Consumer Signal Boosters that operate only on the spectrum of a single provider.

EWA recommends that the personal use restriction be eliminated for Provider-Specific Consumer Signal Boosters. The consumer who installed the device must be a subscriber of that carrier, must have its consent to utilize the particular device, and must have registered that use with the carrier. Under those circumstances, it seemingly is irrelevant whether the consumer uses the signal booster only for his/her own “personal use” activities, however that term might be defined, for matters related to his/her business or other arguably non-personal activities, or even if the consumer allows another individual(s) to utilize it. Since the other individual(s), by definition, must be a subscriber(s) of that same carrier or his/her device(s) otherwise would not be capable of operating on its spectrum, it should be immaterial to the carrier which subscriber is obtaining extended coverage or for what purpose. In fact, it should be advantageous for the carrier if more of its subscribers are able to operate reliably on its spectrum, provided that use does not increase the potential for interference from a signal booster, which the FCC rules ensure it will not.

For these reasons, the Alliance believes that removing the personal use restriction for Carrier-Specific Consumer Signal Boosters would be in the public interest.

ENTERPRISE WIRELESS ALLIANCE

By: 

Mark E. Crosby
President/CEO
2121 Cooperative Way, Ste. 225
Herndon, VA 20171
(703) 528-5115
mark.crosby@enterprisewireless.org

Counsel:

Elizabeth R. Sachs
Lukas, Nace, Gutierrez & Sachs, LLP
8300 Greensboro Drive, Ste. 1200
McLean, VA 22102
(703) 584-8678
lsachs@fcclaw.com

December 29, 2014

Your submission has been accepted

ECFS Filing Receipt -		
Confirmation number: 20141229209092		
Proceeding		
Name	Subject	
10-4	Wireless Telecommunications Bureau seeks comments on petitions regarding the use of signal boosters and other signal amplification techniques used with wireless services.	
Contact Info		
Name of Filer: Enterprise Wireless Alliance		
Email Address: lsachs@fcclaw.com		
Attorney/Author Name: Elizabeth R. Sachs		
Lawfirm Name (required if represented by counsel): Lukas, Nace, Gutierrez & Sachs, LLP		
Address		
Address For: Law Firm		
Address Line 1: 8300 Greensboro Dr.		
Address Line 2: Ste. 1200		
City: McLean		
State: VIRGINIA		
Zip: 22102		
Details		
Type of Filing: COMMENT		
Document(s)		
File Name	Custom Description	Size
10-4 BDA FNPRM.pdf		98 KB
Disclaimer		
<p>This confirmation verifies that ECFS has received and accepted your filing. However, your filing will be rejected by ECFS if it contains macros, passwords, redlining, read-only formatting, a virus, or automated links to other documents.</p> <p>Filings are generally processed and made available for online viewing within one business day of receipt. You may use the link below to check on the status of your filing:</p> <p>http://apps.fcc.gov/ecfs/comment/confirm?confirmation=20141229209092</p> <p>For any problems please contact the Help Desk at 202-418-0193.</p>		