

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

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

**COMMENTS OF THE
TELECOMMUNICATIONS INDUSTRY ASSOCIATION**

The Telecommunications Industry Association (“TIA”)¹ hereby files these Comments in response to the Petition for Further Rulemaking (“Petition”)² filed by Wilson Electronics in the above-captioned proceeding.

TIA supports the Petition for substantially the same reasons stated in the Petition itself. So long as harmful interference to licensees is not an issue – and there is no evidence suggesting otherwise – the Commission should not impose non-technical limitations on devices that restrict particular use cases. In this case, the Commission should be concerned with the technical characteristics of the operations, not the identity of the operator. Just as technology neutrality is an important principle, the Commission should allow device manufacturers to meet the needs of the market appropriately, and ultimately allow both business and individual consumers to select the device most suited to their needs. For these reasons, TIA agrees that the “personal use”

¹ TIA is the leading trade association for the information and communications technology (“ICT”) industry, representing companies that manufacture or supply the products and services used in global communications across all technology platforms. TIA represents its members on the full range of policy issues affecting the ICT industry and forges consensus on industry standards.

² [Wilson Electronics Petition for Further Rulemaking](#), filed Dec. 21, 2016 in WT Docket No. 10-4 (“Petition”).

limitation on signal boosters, including both single-provider and multi-provider boosters, can and should be eliminated.

Improving access to mobile broadband is an ongoing challenge with no one-size-fits-all solution. Licensees themselves now routinely offload traffic to Wi-Fi networks either of their own devise, or in partnership with particular businesses or venues. Small cells and spectrum sharing are another method, and the Commission has taken several steps to advance those technologies, including creation of the Citizens Broadband Radio Service in the 3.5 GHz band³ as well as the Spectrum Frontiers proceeding⁴ to open millimeter-wave spectrum for mobile broadband use.

Using signal boosters to achieve better coverage via existing operator networks represents another path towards achieving the same objective. Better access to existing services from wireless operators could help fill important coverage gaps in indoor areas that might be difficult to obtain otherwise, providing benefits for all concerned. And while eventual 5G services or operator-driven small cell deployments may ultimately be the most likely path for network densification, buildout, and higher-quality service, the Commission should not stand in the way of other options, particularly if currently-available technology can fill an important need.

TIA appreciates the Commission's efforts to address this issue.

³ [Report and Order](#), *Amendment of the Commission's Rules with Regard to Commercial Operations in the 3550-3650 MHz Band*, FCC 15-47, GN Docket No. 12-354 (2015) ("3.5 GHz Order").

⁴ [Report and Order](#), *Use of Spectrum Bands Above 24 GHz for Mobile Radio Services*, GN Docket No. 14-177 (July 14, 2016) ("Spectrum Frontiers Order").

Respectfully submitted,

TELECOMMUNICATIONS INDUSTRY
ASSOCIATION

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