



**TELECOMMUNICATIONS
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July 20, 2012

Marlene H. Dortch
Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, DC 20554

Re: *Ex Parte* Submission – ET Docket Nos. 10-236 and 06-155

Dear Ms. Dortch:

On Wednesday, July 18, 2012, Brian Scarpelli and Albert Kang of the Telecommunications Industry Association (“TIA”); David Hilliard of Wiley Rein, LLP, representing TIA; Chuck Eger, Motorola Mobility, LLC; Rob Kubik, Samsung; and Aya Kiy, Research In Motion met with Julius Knapp, Chief of the Federal Communications Commission’s (“Commission”) Office of Engineering and Technology (“OET”); Bruce Romano, OET; Ira Keltz, OET; and, via teleconference, Rashmi Doshi and Joe Dichoso of the OET Labs; to discuss, under the above-captioned dockets,¹ TIA’s concerns related to the restrictions on the number of products that can be imported for testing if the devices are not type approved.²

TIA discussed how the import limitations can result in an overly-burdensome process during the development and testing phases of product design. We discussed with OET possible ways that the burden on manufacturers and Commission staff could be lessened, and specifically urged that the import limitation ceiling be increased to up to 8,000.

¹ *Promoting Expanded Opportunities for Radio Experimentation and Market Trials under Part 5 of the Commission’s Rules and Streamlining Other Related Rules*, ET Docket No. 10-236, 2006 Biennial Review of Telecommunications Regulations – Part 2, Administered by the Office of Engineering and Technology (OET), ET Docket No. 06-155, Notice of Proposed Rulemaking, FCC 10-197 (rel. November 30, 2010).

² See 47 CFR § 2.1204.

Pursuant to Section 1.1206 of the Commission's rules,³ this letter is being electronically filed via ECFS and a copy of this submission is being provided electronically to the meeting attendees.

Respectfully submitted,

TELECOMMUNICATIONS INDUSTRY ASSOCIATION

By: /s/ Brian Scarpelli

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Julius Knapp, OET
Bruce Romano, OET

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47 C.F.R. § 1.1206.