



December 22, 2015

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

Re: Revision of Part 15 of the Commission's
Rules to Permit Unlicensed National
Information Infrastructure (U-NII) Devices in
the 5 GHz Band, ET Docket No. 13-49

Dear Ms. Dortch:

The Telecommunication Industry Association appreciates the Commission's action earlier this month extending the certification date of 'new products' to U-NII device (5725-5850 MHz band) rules of 47 CFR 15.407 to March 2, 2016.¹

We strongly encourage the Commission never the less to give full consideration to the potential challenges that both the timing of its future decisions and the applicable deadlines could present for suppliers, manufacturers and retailers. In order to assure that the supply of products that rely on unlicensed wireless connectivity is not disrupted, an appropriate extension is necessary in the implementation of any revised rule. Sufficient time for compliant products to be produced and brought to market should be provided.

As Intel has proposed, the Commission should "require compliance no earlier than nine months from the release of a decision on the pending petitions for reconsideration of the OOB limits adopted in the First Report and Order." As the company further has said, "This revised approach will assure that high volume manufacturers like Intel and many of its OEM partners have sufficient time to adjust to changes in the U-NII-3 OOB limit."²

¹ ET Docket 13-49, Adopted December 2, 2015 Released December 3, 2015

² See, Comments of Intel, ET 13-49 (filed Nov 6, 2015)

TIA supports the request that the June 2nd 2016 by which all U-NII-3 equipment sold in the United States must be compliant with Section 15.407 be reset to be no sooner than 9 months after the release of a decision on the pending petitions for reconsideration of the OOB limits adopted in the First Report and Order.

As additional companies and stakeholders have collectively noted: “the extension requests in order to provide sufficient certainty and time for the marketplace to implement and test equipment, and sufficient time for the FCC to approve these devices before the deadline.”³

Respectfully submitted,

TELECOMMUNICATIONS INDUSTRY
ASSOCIATION

By: /s/ Mark Uncapher

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³ See, Comments of Alcatel-Lucent, Cambium Networks, Ltd. Fastback Networks JAB Wireless, Inc. Mimosa Networks, Inc. Ubiquiti Networks, Inc. Zebra Technologies Wireless Internet Service Providers Association, ET 13-49 (filed Nov 24, 2015) and also see Comments of HP Inc., ET 13-49 (filed Dec 10 2015)