

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
Promoting Technological Solutions to Combat)	GN Docket No. 13-111
Contraband Wireless Device Use in Correctional)	
Facilities)	
)	

COMMENTS OF THE TELECOMMUNICATIONS INDUSTRY ASSOCIATION

I. INTRODUCTION AND SUMMARY

The Telecommunications Industry Association (“TIA”) respectfully submits these comments in response to the Commission’s Third Further Notice of Proposed Rulemaking (“*FNPRM*”) seeking comment on the authorization of non-federal radio frequency (“RF”) jamming solutions in correctional facilities.¹ TIA shares the Commission’s concern about the public safety threat posed by contraband wireless devices in correctional facilities. And TIA fully supports targeted efforts to address that threat at the federal and state level, such as through using contraband interdiction systems (CISs).

However, the Commission should be circumspect in authorizing correctional facilities to deploy RF jamming solutions to combat contraband wireless devices. In contrast to CISs, which

¹ *Promoting Technological Solutions to Combat Contraband Wireless Device Use in Correctional Facilities*, Third Further Notice of Proposed Rulemaking, GN Docket No. 13-111, FCC 25-65 (rel. Sept. 30, 2025) (“*FNRPM*”).

represent a surgical tool, RF jamming solutions are a blunt instrument. Since the Commission first considered the issue more than a decade ago, the industry has identified the harms posed by jamming systems—specifically, potential interference with legitimate wireless devices in use inside and outside prisons and interruption to emergency communications. Those harms remain the same today, although their effects are magnified by the increased use of wireless devices for broadband. If an RF jamming solution is deployed at a correctional facility, such deployment risks not only interfering with voice communications but disrupting vital broadband services as well within the facility itself as well as the surrounding community. The Commission should consider these risks carefully before authorizing RF jamming solutions in correctional facilities.

II. DISCUSSION

The Commission Should be Circumspect in Authorizing RF Jamming Solutions in Correctional Facilities.

There can be no serious dispute that contraband wireless devices in correctional facilities pose a serious public safety threat. As the Commission correctly observes, such devices are used to “orchestrate criminal activity” both inside and outside the correctional facility’s walls and such use “to perpetrate crimes” undermines public safety. *FNPRM* ¶¶ 1, 4. TIA also agrees with the Commission’s assessment that contraband wireless devices remain an “exceptionally challenging and complex” problem and commends the Commission for exploring creative solutions to address that issue. *FNPRM* ¶ 1.

But while RF jamming solutions may be effective in combating the use of contraband wireless devices, it is fair to say that such solutions present the tangible risk of a host of harms in a correctional facility and the surrounding area outside. The Commission acknowledged as much more than a decade ago, noting that RF jamming solutions “render[] any wireless device operating on those frequencies [subject to RF signal jamming] unusable” and thus interfere with

legitimate devices, including devices making 911 calls.”² Indeed, according to the Commission, RF signal jammers are “inherently unsafe” and “per se illegal because they are designed to compromise the integrity of the nation’s communications infrastructure.”³

Before deciding whether to change course and authorize RF jamming solutions in correctional facilities, the Commission should consider carefully the public safety effects of any such decision. For example, the authorization of RF jamming solutions in a correctional facility would endanger critical communications by public safety personnel in that facility and “could have the unintended consequence of putting outside responders at risk in the event of an emergency, such as a prison riot.”⁴

RF jamming solutions also could disrupt critical communications outside a correctional facility. As CTIA has pointed out, a study conducted by the National Telecommunications and Information Administration (NTIA) in coordination with the Federal Bureau of Prisons in South Carolina established a risk of harmful interference at both 20 and 40 meters (66 and 132 feet) away from the jamming solution, although no attempt was made “to determine how far away one would have had to be for that risk to dissipate completely.”⁵

² *Promoting Technological Solutions to Combat Contraband Wireless Device Use in Correctional Facilities*, GN Docket No. 13-111, Notice of Proposed Rulemaking, 28 FCC Rcd 6603, ¶ 18 (2013) (Contraband NPRM).

³ *The Supply Room, Inc.*, Notice of Apparent Liability for Forfeiture and Order, 28 FCC Rcd 4981, ¶ 7 (2013).

⁴ Ex Parte of CTIA, GN Docket No. 13-111, at 2-3 (filed Mar. 15, 2017) (citing *Warden Among those Hurt in Prison Riot*, WKRG.com (Mar. 12, 2016), which described a prison riot that necessitated a response from several outside law enforcement agencies).

⁵ CTIA Comments, GN Docket No. 13-111, at 14 (filed Sept. 16, 2020); *see also* Reply Comments of T-Mobile USA, Inc., GN Docket No. 13-111, at 8 (filed Oct. 1, 2020) (noting that RF jamming solutions put “[i]ndividuals working, visiting, and living around correctional facilities” at risk of “losing their communications services”).

Furthermore, as noted in the *FNPRM*, RF jamming solutions do not interfere just with the frequencies subject to the signal jamming but also can adversely impact public safety communications on adjacent bands. *Id.* ¶ 9 (noting the potential for RF jammers to interfere unintentionally with public safety communications that operate in dedicated segments of the 700 MHz and 800 MHz bands licensed to state and local jurisdictions for the operation of public safety communications systems, which are adjacent to band segments licensed to commercial wireless carriers). Thus, before authorizing an RF jamming solution at a correctional facility, the Commission should determine whether that solution will disrupt public safety communications on adjacent bands.

The public safety harms posed by RF jamming solutions have remained unchanged in the intervening years since the Commission first considered whether to authorize non-federal correctional facilities to utilize such solutions. However, their impacts are only exacerbated by the growth in mobile broadband.

The Pew Research Center estimates that 91 percent of Americans own a smartphone, up from just 35 percent in 2011, with nearly 16 percent of U.S. adults using their smartphone in lieu of a home broadband service to access the Internet.⁶ Americans rely extensively on their mobile devices for Internet access. According to CTIA, Americans consumed 132T megabytes of data in 2024, a substantial increase from the 100T MB record set just the previous year, and “for the third straight year, demand grew roughly 35%, a pace that would nearly double the amount of data used every two years.”⁷

⁶ Pew Research Center Mobile Fact Sheet (Nov. 20, 2025), available at <https://www.pewresearch.org/internet/fact-sheet/mobile/>.

⁷ CTIA 2025 Annual Survey Highlights, available at <https://api.ctia.org/wp-content/uploads/2025/09/2025-Annual-Survey-Highlights.pdf>.

First responders increasingly depend on broadband in discharging their duty to protect the public. For example, the broadband capabilities enabled by FirstNet permit first responders to share complex data and access critical databases, such as criminal records or building blueprints, and support real-time applications like streaming video from body-worn or drone cameras. Broadband services have been critical to improvements in situational awareness by first responders and enhanced public safety operations.

The interference caused by RF jamming solutions jeopardizes these broadband services as well as traditional voice communications, including calls to 911. Given these threats to public safety, the Commission should consider carefully whether such threats can reasonably be avoided before authorizing a correctional facility to use RF jamming solutions to combat contraband wireless devices.

Respectfully submitted,

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