

October 3, 2019

**VIA ELECTRONIC FILING (ECFS)**

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12th Street SW  
Washington, DC 20554

Re: Ex Parte Notice: Amendments of Parts 0, 1, 2, 15, and 18 of the  
Commission's Rules regarding Authorization of Radiofrequency  
Equipment – WT Docket No. 15-170

Dear Ms. Dortch,

On October 1, 2019, the undersigned counsel of Garmin International, Inc. (“Garmin”) met with Jamison Prime, Associate Chief (Legal) of the Commission's Office of Engineering and Technology, to discuss the status of the Commission's pending proposal in the above-referenced proceeding to adopt a process for provisional certification of radiofrequency devices subject to equipment certification. We discussed the potential benefits to industry of a provisional certification process that would preserve short-term confidentiality of product information but “could be used for legal importation and distribution through the supply chain of devices prior to sale.”<sup>1</sup> We also discussed potential terminology and needed changes to the FCC rules to effectuate and implement the proposal.

Pursuant to Section 1.1206(b)(2) of the Commission's rules, an electronic copy of this letter is being filed for inclusion in the above-referenced docket. If you have any questions about this filing, please contact the undersigned.

Sincerely,

/s/ Timothy J. Cooney

M. Anne Swanson

Timothy J. Cooney

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<sup>1</sup> *Amendment of Parts 0, 1, 2, 15 and 18 of the Commission's Rules regarding Authorization of Radiofrequency Equipment*, Notice of Proposed Rulemaking, 30 FCC Rcd 7725 ¶ 92 (2015).