


Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street S.W.
Washington D.C. 20554

WTB Docket No. 19-272

Dear Secretary Dortch,

The undersigned distributors of Consumer Signal Boosters herein express their opposition to the request for waiver of the FCC's rules that was filed by Pivotal Commware. We oppose this request because it would effectively permit wireless carriers to market Pivotal's signal boosters directly to consumers even though the boosters do not meet the technical requirements for Consumer Signal Boosters, including the critically important Network Protection Standard ("NPS"). Absent clear labelling indicating that such boosters do not qualify as FCC-certified Consumer Signal Boosters, consumers may unknowingly purchase those devices even though such boosters could cause significant harmful interference to the wireless networks that consumers rely upon for broadband access. In addition, the ability to sell non-NPS compliant signal boosters would further aggravate the unfair competitive advantage that the wireless carriers possess in marketing wireless components and products to end users.

As the Commission is aware, NPS-compliant Consumer Signal Boosters are more expensive to manufacture than non-NPS-compliant boosters. These additional technical capabilities, however, were deemed necessary by the Commission to ensure the integrity of wireless networks. Further, multiple years of experience in the sale, installation and use of NPS-compliant Consumer Signal Boosters have clearly demonstrated the justification for adopting the NPS requirements in that each of the wireless carriers have acknowledged that they have received almost no complaints of harmful interference resulting from NPS-compliant Consumer Signal Boosters. Therefore, any company that is permitted to market non-NPS compliant boosters to consumers could place the integrity of wireless networks at risk, while profiting off its unfair advantage in the industry as compared to those companies that satisfied the Commission's mandate by developing and marketing NPS-compliant Consumer Signal Boosters for use by consumers.


George Graham
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