Marlene H. Dortch

Secretary

Federal Communications Commission

445 12th Street S.W.

Washington D.C. 20554

**WTB Docket No. 19-272**

Dear Secretary Dortch,

I am a distributor of Consumer Signal Boosters and herein express my opposition to the request for waiver of the FCC’s rules filed by Pivotal Commware. I oppose this request because it would effectively permit wireless carriers to market Pivotal’s signal boosters that DO NOT MEET the technical requirements for Consumer Signal Boosters directly to consumers. Additionally, it would bypass the critically important Network Protection Standard (“NPS”). Absent clear labeling 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 and harmful interference to the wireless networks that our consumers rely upon for broadband access. 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 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 zero complaints of harmful interference resulting from NPS-compliant Consumer Signal Boosters. Therefore, any company permitted to market non-NPS compliant boosters to consumers could place the integrity of wireless networks at risk. Profiting off of this unfair advantage in the industry as compared to our companies that satisfied the Commission’s mandate would effectively create a monopoly. Please deny this waiver and continue to follow your mandate for developing and marketing NPS-compliant Consumer Signal Boosters for use by consumers.

Sincerely,

John Holthaus

GoldCom

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