Marlene H. Dortch

Secretary

Federal Communications Commission

445 12th Street S.W.

Washington D.C. 20554

WTB Docket No. 19-272

Dear Secretary Dortch, See also the last sentence.

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 NPScompliant 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.

Additionally, the carriers are exempt from local permitting. Therefore, they “inspect” themselves.

How fair is that? They will be allowed as they have in the past to perform installs that do not meet local building fire and life safety codes.

Richard Schemitsch

Advanced Cable Connection Inc.

richard@accicable.com