



October 7, 2019

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 would like to express my opposition to the request for waiver of the FCC's rules that was filed by Pivotal Commware.

I 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"). Unlike the current boosters I sell, I have been informed that these boosters will be absent the 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 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. A few years ago these additional technical capabilities were deemed necessary by the Commission to ensure the integrity of wireless networks.

Any company that is permitted to market non-NPS compliant boosters to consumers has an unfair advantage in the industry. The SureCall, weBoost, and WilsonPro boosters that I sell have satisfied the Commission's mandate by developing and marketing NPS-compliant Consumer Signal Boosters for use by consumers.

This future monopolistic practice is exactly why your organization and congress have broken up larger companies in the past. In addition, the Telecommunications Act of 1996 allowed for consumers to have a choice.

They say, "those who do not learn from the past are doomed to repeat it". Please learn from past mistakes and allow competition to keep America great!

Respectfully yours,

Seth M. Fangué