

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

WTB Docket No. 19-272

Dear Secretary Dortch,

As a retailer and distributor of consumer signal boosters, we herein express our opposition to the request for waiver of the FCC's rules that was filed by Pivotal Commware. We oppose this request because of the harm that could be caused to the carriers, consumers and the reputation of the signal booster industry by allowing a signal booster solution that does not comply with the Network Protection Standard ("NPS") to freely operate on the carrier networks.

As a recent Wired.com article (<https://www.wired.com/story/unlicensed-signal-boosters-amazon/>) has shown, the issue of boosters that do not implement the Network Protection Standard continues to plague the signal booster industry. User reviews of these non-NPS compliant boosters routinely talk of customers being told by the carriers to permanently shut the booster down because of the interference they're causing on the carrier's network. This is bad for the carriers and for the public perception of the signal booster industry, which has enabled millions of consumers to have cell phone access in their homes and vehicles, when they would not have otherwise.

The NPS has consistently proven its need in the years since the FCC ruled on the use of signal boosters. Every major carrier has acknowledged that they have received almost no complaints of harmful interference resulting from the use of NPS compliant consumer signal boosters since the regulations were put into effect. This is in contrast to the regular issues that arise from using non-NPS compliant signal boosters.

Currently, it is not possible to create a Part 20 compliant signal booster that supports the new 5G networks and frequencies. As such, Pivotal Commware has chosen to create an industrial booster and request an exemption from the labeling requirements, under the justification that their boosters would be controlled by the distributing carrier who could shut down the booster if there was an issue. The problem with this is that multiple carriers will be operating on the frequency bands that the non-compliant Pivotal booster will be boosting, and without proper NPS in place, there is a high likelihood of negatively impacting other carriers who did not approve the booster for use on their network, and as such, have no recourse.

With such an obvious need for all signal boosters to conform to the NPS, we strongly urge you to reject the waiver filed by Pivotal Commware, especially considering they are a new entrant to the field who have no FCC approved devices and have never shown that they have the technical capabilities to design and manufacture a device that can comply with the FCC regulations.

To ensure the safety of the individual users and of the carrier networks, the best route forward is to hold all manufacturers to the same standard requiring that every signal booster meet the Part 20 rules or contain the full industrial booster warning label.

In addition, in order to enable all manufacturers to create boosters that will support the new 5G networks, the Part 20 rules should be amended to allow signal boosters to operate on all existing and upcoming cellular frequencies, including the recently auctioned millimeter wave frequencies.

Respectfully,
Simple Foundry LLC

By:

A handwritten signature in black ink, appearing to read "Dan Morin", is written over a light blue rectangular background.

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