

February 1, 2017

VIA EMAIL & U.S. MAIL

Ajit Pai, Chairman
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: WT Docket No. 10-4, RM-11784

Dear Chairman Pai:

On June 15, 2017, representatives of Wilson Electronics, LLC (“Wilson”), the leading manufacturer of Consumer Signal Boosters (“CSBs”), and United Parcel Service, Inc. (“UPS”), the world’s largest package delivery company, met with you and discussed Wilson’s proposal that the Commission eliminate the personal-use restriction on all CSBs. Under that restriction, CSBs may only be sold to members of the general public for their personal use, and they may be operated by subscribers only for personal use.

At our meeting, we discussed the benefits that would flow if commercial enterprises like UPS were permitted to use CSBs in the course of their businesses. You were advised that UPS would deploy CSBs in its smaller operating facilities, if the personal-use restriction was eliminated.

UPS is now actively planning to deploy new machine-to-machine communications technologies, and estimates that signal boosters will be required to support that project at between 300 and 400 of its more than 7,000 U.S. facilities. Based on the requirements of this project, UPS believes that CSBs such as those sold by Wilson are the most appropriate solution at these locations. The use of CSBs in these facilities is a cost effective way to drive scalability, efficiencies and accuracy for UPS, which is a key player in the growth of the digital economy. As things stand now, the Commission would have to grant two rule waivers to allow UPS to deploy CSBs at its facilities. Wilson would have to obtain a waiver of § 20.21(a) of the Commission’s rules, which prohibits the sale of CSBs to commercial enterprises. And UPS would have to obtain a waiver of § 20.21(g), which prohibits commercial enterprises from operating CSBs for commercial purposes. Wilson and UPS believe that they can make compelling showings that the rules should be waived. Obviously, however, they would have no need to burden the Commission with requests for rule waivers if the personal-use restriction is promptly repealed as proposed by Wilson.

We ask that the Commission obviate the need for rule waivers by acting expeditiously to formally eliminate the personal-use restriction. That deregulatory action would free businesses,

public safety entities, public institutions, and other enterprises to deploy cost-effective CSBs to enhance wireless coverage.

A copy of this letter is being filed in WT Docket No. 10-4.

Sincerely,

WILSON ELECTRONICS, LLC

UNITED PARCEL SERVICE, INC.

By: /s/
Bruce Lancaster, President & CEO
2890 E. Cottonwood Parkway #325
Salt Lake City, UT 84121

By: /s/
Timothy B. Totten, Wireless Architect
2200 Outer Loop
Louisville, KY 40219-3565

cc: Roger Noel
Kathy Harris