

October 23, 2019

VIA ELECTRONIC FILING (ECFS)

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

Re: Ex Parte Notice: Amendments of Parts 0, 1, 2, 15, and 18 of the
Commission's Rules regarding Authorization of Radiofrequency
Equipment – WT Docket No. 15-170

Dear Ms. Dortch,

On October 21, 2019, the undersigned counsel of Garmin International, Inc. (“Garmin”) spoke by telephone with Rashmi Doshi, Chief, Laboratory Division, Office of Engineering and Technology, for a follow-up discussion regarding the FCC’s pending proposal in the above-referenced proceeding to adopt a process for provisional certification of radiofrequency devices subject to equipment certification. Besides addressing the benefits to industry of a provisional certification process that would preserve short-term confidentiality of product information but “could be used for legal importation and distribution through the supply chain of devices prior to sale,”¹ we discussed various means for balancing confidentiality while at the same time ensuring smooth effectuation and implementation of a provisional certification program.

Pursuant to Section 1.1206(b)(2) of the Commission’s rules, an electronic copy of this letter is being filed for inclusion in the above-referenced docket. If you have any questions about this filing, please contact the undersigned.

Sincerely,

/s/ Timothy J. Cooney

M. Anne Swanson

Timothy J. Cooney

¹ *Amendment of Parts 0, 1, 2, 15 and 18 of the Commission’s Rules regarding Authorization of Radiofrequency Equipment*, Notice of Proposed Rulemaking, 30 FCC Rcd 7725 ¶ 92 (2015).