

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of

Amendment of Parts 1, 2, 22, 24, 27, 90 and 95 of the Commission's Rules to Improve Wireless Coverage Through the Use of Signal Boosters)	WT Docket No. 10-4
)	
Wireless Telecommunications Bureau Seeks Comment on Wilson Electronics Petition for Rulemaking to Eliminate the Personal Use Restriction on Wideband Consumer Signal Boosters)	DA 17-220

COMMENTS OF STAIRCASE 3, INC, D/B/A REPEATERSTORE AND RSRF

Staircase 3, Inc., d/b/a RepeaterStore and RSRF ("Staircase 3, Inc."), hereby responds to the Wireless Telecommunications Bureau's ("Bureau") Public Notice seeking comment on the potential elimination of the personal use restriction on consumer signal boosters.

Staircase 3, Inc. participated in the Commission's original wireless signal booster proceeding, and has supported rules that both protect networks and enable consumers and businesses to improve cellular reception in their homes, vehicles, and places of business. Consistent with this prior advocacy, we strongly support Wilson's petition for further rulemaking to remove the "personal use" restriction on the operation of consumer signal boosters.

The "personal use" restriction in the Commission's existing rules is vague, confusing, and has hampered the adoption of cell phone signal boosters by small businesses, who are often most acutely affected by gaps in cellular coverage. At the same time, the restriction provides no additional protection to the integrity of carrier's cellular networks.

We are a reseller of Nextivity, Inc.'s Cel-Fi line of signal boosters, but nevertheless strongly disagree with their comments in response to this petition. They wrongly imply that by removing the "personal use" restriction the Commission would enable "industrial" applications. However, the FCC has already

designated a separate classification for industrial boosters, to which the more stringent “Network Protection Standard” rules do not apply. Removing the personal use restriction would simply make the signal boosters currently available for “personal use” available to small businesses.

Furthermore, Nextivity, Inc.’s filing states that downlink intermodulation products would potentially cause harmful interference. Given the limited downlink power defined by the commission’s Network Protection Standard and the existing limitation that such signal boosters be used inside buildings, the idea that downlink intermodulation would produce any kind of harm to carrier’s networks is simply false. Nextivity, Inc. is attempting to affect regulations in such a way as to give their particular implementation of signal booster technology an unfair regulatory advantage in the market. We strongly urge the FCC to recognize and reject such anti-competitive attempts.

Staircase 3, Inc. fully supports the removal of the “personal use” restriction for both carrier-specific and wideband boosters, and believe that it would greatly benefit of thousands of small businesses who are currently unable to deploy signal booster technology at their places of business.

Respectfully submitted,

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