

**BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, DC 20554**

IN RE:

**REQUEST BY 32 TECHNOLOGIES LLC
FOR WAIVER OF SECTION 15.250(C)
OF THE COMMISSION’S RULES**

DOCKET No. _____

TO: CHIEF, OFFICE OF ENGINEERING AND TECHNOLOGY

**SUPPLEMENT TO
REQUEST FOR WAIVER**

32 Technologies LLC (the “Company”), by and through its attorneys, and pursuant to Section 1.3 of the Federal Communications Commission’s rules, 47 C.F.R. § 1.3 (2018), hereby Supplements its Request for Waiver of Section 15.250(c).¹

The Company seeks to supplement its commitments previously specified in the Waiver Request. In particular, the Company hereby commits to include information in its User Manual and promotional materials to clearly “convey...information to users” that the outdoor anchors shall not be placed more than three (3) feet above ground level.² The Company has tested the operation of the outdoor anchors at this height and determined that such operation does not cause additional interference concerns, and is the lowest acceptable height that will account for different sized pets.

¹ See 47 C.F.R. § 15.250(c) (2018) (“Except for operation onboard a ship or a terrestrial transportation vehicle, the use of a fixed outdoor infrastructure is prohibited. A fixed infrastructure includes antennas mounted on outdoor structures, e.g., antennas mounted on the outside of a building or on a telephone pole.”). The Company submitted its Request for Waiver on October 19, 2018.

² See *iRobot Corporation Request for Waiver of Section 15.250 of the Commission’s Rules*, Order, 30 FCC Rcd 8377, 8380 (OET 2015). (“Operation under this waiver is limited to residential use only. iRobot will take appropriate steps (including device and instruction manual labeling) to convey this information to users, and will only market the device as a residential-use product.”).

Therefore, 32 Technologies LLC respectfully requests a waiver of Section 15.250(c) of the FCC's rules to permit the Company to complete the equipment authorization process for the pet collar as described herein. Further, to the extent necessary, 32 Technologies LLC requests that the FCC take all steps to expedite the processing of this Request for Waiver in order to permit the timely implementation and marketing of the product.

Respectfully submitted,

32 TECHNOLOGIES LLC

By: /s/ Lee G. Petro

Lee G. Petro

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