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ELECTRONIC FILING

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

Re: Second Further Notice of Proposed Rulemaking, WT Docket No. 10-4

Dear Ms. Dortch:

Wilson Electronics LLC (“Wilson”), by its undersigned counsel, hereby voices its agreement with T-Mobile USA, Inc. that any new labeling requirements that are adopted in the above-referenced rulemaking apply only to Consumer Signal Boosters packaged after the effective date of the new rules. *See* Comments of T-Mobile USA, Inc., WT Docket No. 10-4, at 3-4 (May 18, 2018). Wilson also agrees with the commenters that argued that the Commission should accommodate the manufacturing cycle by affording manufacturers adequate production lead time with respect to complying with the new labeling requirements. *See* Comments of Volkswagen Group of America, Inc., WT Docket No. 10-4, at 4 (May 18, 2018); Reply Comments of Porsche Cars North America, Inc., WT Docket No. 10-4, at 6 (June 18, 2018).

Wilson respectfully requests that Consumer Signal Booster manufacturers be allowed six months from the effective date of the new rules to transition completely to devices that meet the Commission’s new labeling requirements. To that end, the Commission should adopt a “two-step transition process” like the one it employed when it first authorized the deployment of Consumer Signal Boosters. *See 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*, 28 FCC Rcd 1663, 1709-10 (¶ 133) (2013). First, the Commission should prescribe that all Consumer Signal Boosters (except embedded Consumer Signal Boosters) manufactured on or after the effective date of the new rules must meet the new labeling requirements. Second, it should grandfather non-complying Consumer Signal Boosters for a six-month period after which all such signal boosters that are marketed or sold in the United States must meet the new labeling requirements.

Very truly yours,

/s/ Russell D. Lukas

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