



TELECOMMUNICATIONS
INDUSTRY ASSOCIATION

1320 N. Courthouse Rd., Suite 200
Arlington, VA 22201 USA
www.tiaonline.org

Tel: +1.703.907.7700
Fax: +1.703.907.7727

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October 20, 2014

Marlene H. Dortch
Secretary
Federal Communications Commission
445 Twelfth St., S.W.
Washington, DC 20554

Re: *ET Docket Nos. 13-84; 03-137*

Dear Ms. Dortch:

On Thursday, October 16, 2014, the Telecommunications Industry Association (“TIA”) met with Federal Communications Commission’s (“Commission”) Office of Engineering and Technology (“OET”). The purpose of this meeting was for TIA to discuss process-related issues under the above-referenced dockets related to human exposure to radio frequency electromagnetic fields.¹

TIA urged for the Commission to move swiftly to resolve the pending petition for reconsideration submitted by the American Association for Justice² to the Commission’s March 2013-released Report & Order which clarified consideration of the pinna (outer ear) as an extremity. TIA reiterated its view that the Petition should be immediately dismissed due it being procedurally insufficient, as well as applying an improper standard of review of the Commission’s R&O.³

¹ Reassessment of Federal Communications Commission Radiofrequency Exposure Limits and Policies, Proposed Changes in the Commission’s Rules Regarding Human Exposure to Radiofrequency Electromagnetic Fields, First Report & Order, Further Notice of Proposed Rulemaking, Notice of Inquiry, ET Docket Nos. 13-84, 03-137 (rel. Mar. 29, 2013) (“R&O”, “FNPRM”, or “NOI”).

² Petition for Reconsideration of the American Association for Justice, ET Docket No. 03-137 (filed Jul. 1, 2013) (“Petition”).

³ See Opposition of TIA, ET Docket No. 03-137, filed Sept. 11, 2013.

Consistent with TIA's views,⁴ TIA further urged for the Commission to move forward as soon as possible to resolve the pending FNPRM and NOI.

In attendance were: Brian Scarpelli, TIA; Chuck Eger, Motorola Mobility; Aya Kiy, Blackberry; Robert Kubik, Samsung; Chuck Powers, Motorola Solutions; David Case, Cisco (via conference call); John Forrester, Qualcomm (via conference call); and John Lewczak, Motorola Mobility (via conference call). Attendees from the Commission were: Julius Knapp, OET Chief; Ed Mantiplay, OET; Rashmi Doshi, OET Laboratory Division Chief (via conference call); William Hurst, OET (via conference call); Mark Neumann, OET (via conference call); and Travis Thul, OET (via conference call).

Pursuant to the Commission's rules,⁵ this letter is being electronically filed via ECFS and a copy of this submission is being provided electronically to the meeting attendees.

Respectfully submitted,

TELECOMMUNICATIONS INDUSTRY ASSOCIATION

By: /s/ Brian Scarpelli
Brian Scarpelli
Director, Government Affairs

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cc: Julius Knapp
Ed Mantiplay
Rashmi Doshi
William Hurst
Mark Neumann
Travis Thul

⁴ See Comments of TIA, ET Docket Nos. 13-84 and 03-137 (filed Sept. 13, 2013). See also Reply Comments of TIA, ET Docket Nos. 13-84 and 03-137 (filed Nov. 18, 2013).

⁵ 47 C.F.R. § 1.1206.