

60001012146.txt

Regarding proceeding RM-11737, American Hospitality & Lodging Association, Marriott International, Inc., and Ryman Hospitality Properties (collectively, "Petitioners"), seek a declaration that "the operation of FCC-authorized equipment by a Wi-Fi network operator to manage its network on its premises does not violate Section 333, even though such operation may 'interfere with or cause interference to' a Part 15 device being used by a guest on the operator's property."

However, operating a Wi-Fi network on its premises in no way grants the Petitioners the right to interfere with or deny the operation of other Wi-Fi networks on the same premises. Additionally, the potential for harm to Petitioners' Wi-Fi network is a false flag. Every Wi-Fi user in the U.S. accepts this possibility every day; in fact, it's part of the usefulness and ubiquity of the unlicensed spectra that Wi-Fi exists in (2.4GHz and 5GHz).

This petition is rather nakedly about Petitioners preserving a revenue stream for themselves artificially, rather than offering a superior service that would encourage payment from their guests.

Enforcement of violations of Wi-Fi networks spectra should remain firmly in the hands of the Commission, and not be deferred to Petitioners or other bodies.