

Matthew B. Kent  
8984 E Rainsage St  
Tucson, AZ 85747

January 14<sup>th</sup> 2014

Federal Communication Commission  
Consumer and Governmental affairs Bureau

RE: Proceeding RM-11737

In the Matter of Petition of American Hotel & Lodging ) RM-11737  
Association, Marriott International, Inc., and )  
Ryman Hospitality Properties for a Declaratory )  
Ruling to Interpret 47 U.S.C. § 333 or, in the )  
Alternative, for Rulemaking )

I find this “petition” to be nothing more, then a clever way for the petitioner and others to charge customers who visit their establishments and to create a MONOPOLY. It will block me from to freely accessing the internet, from my personal device.

The scenario they have created “A honey pot” Really? This is an absurd notion of “false” access points to gather information from customers, is yet another false positive of manipulation. We have seen time and time again in order to regulate information OR as better know CONTROL a single point of internet access, while they are the “gatekeepers” of access, while on their property. Why not create a single point of interception and then CHARGE for it?

Its seems like they need to improve both HOST and USER authentication protocols environment. Maybe they can ask another technology company for help in this authentication process. Cisco ALSO publicly supports the petitioners of this filing. I would think, that in retrospect CISCO would be on the side of the end user, but clearly they are on the side MONEY MAKER. I am glad that Microsoft and other open source organizations, have the ability to clearly see through this petition, as nothing more then a corporation wishing to regulate its will via the FCC or other government body, by stepping on the civil liberties of Americas, who choose where to access the internet.

Lets run through this: The FCC permits the hotel conglomerate to block personal access points. The hardware and software protocols need to be developed. I wonder, who can develop this? I am sure that one of the supporters of this petition can be of assistance? So this is based on “Security” and not a financial gain? Also absurd to think that large corporations would support this, if there was not a large financial gain associated with it. “You can come in my shop and surf the internet, drink your coffee, but you have to use my access (Since I block everything else and I will charge you \$2.00, for said access).”

So if this is opened up to hotels, how about other places? Restaurants? Coffee places? Once the cat is out of the bag, it will never be put back in. Who is to say this technology will be limited to just WIFI? Suppose one of the big cell phone providers signs a support agreement with the hotel? Cell phones can be exploited and INTERCEPD just as WIFI signals. So, everyone gets blocked, except the provider. There are many different scenarios that can be explored and this was just one of them. Also developmental technology, currently outside the scope of this petition may be deployed in several years Will this technology also be blocked?

There are many off the shelf hardware and software applications that do not block WIFI nor are outwardly offensive to other WIFI access points. In the matter of exploitation, there will and will always be an exploitable environment in communication. To think that deploying this “secure” technology is cure all for “Hony Pots” and other exploitation methods is absurd in its logic. Once the work around is achieved, will create a complacent, exploitable single point of entry environment.

ALSO with large scale deployment, can you imagine 2 access points across the street from each other, blocking each other at the fringes? Or driving by in my vehicle, streaming audio, then I come to DEAD ZONE of blockage between 2 competing WIFI spots, while I am trying to stream my audio, from MY provider that I pay for? I am convinced this technology may not be sustainable and containable to just the local environment.

I am fairly sure that this technology has already been developed and ready for deployment in some quiet lab, but in order to use and roll out this technology out, its needs a catalyst (Proceeding RM-11737 ) to be deployed legally and effectively in the United States.

If, the petitioner was so concerned about security and access, then why not open the environment up and provide free, unobstructed access, make it free and then block personal access points? If they were really upfront and this was not a cash cow for them, they they would petition the FCC based on free access and blocking personal devices. Then the provision of providing a “free secondary service” to its customers makes more logical sense and less public outcry. I feel this way for the petitioner and supporters of RM-11737.

Marriott’s petition should be DENIED simply on the grounds that interference with WiFi-based Personal Area Networks and interferes with my Civil Liberties and my ability to choose on where I access the internet.

Public outcry from allowing this, might be substantial, because IF this is allowed, everyone will jump on monopoly bandwagon and will vastly change WIFI environment as we know it.

Respectfully,  
Matthew B. Kent  
Vice President Radio Society of Tucson  
Former Director Information Services  
-Counter Intelligence Deployment Specialist  
-Information Security Manager  
-Physical Security Manager  
-Amateur Radio Operator NG2Q