

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

In the Matter of )  
Amendment of Parts 1, 2, 22, 24, 27, 90 and 95 of ) WT Docket No. 10-4  
the Commission’s Rules to Improve Wireless )  
Coverage Through the Use of Signal Boosters )

**REPLY COMMENTS OF AT&T**

AT&T Inc., on behalf of itself and its affiliates (“AT&T”), hereby submits reply comments in response to the Federal Communications Commission’s (“FCC” or “Commission”) Order on Reconsideration and Further Notice of Proposed Rule Making (“FNPRM”). The order granted the Wi-Ex Petition and amended certain technical rules for Wideband Consumer Signal Boosters. The order also granted in part the Verizon Petition and amended certain technical rules for mobile Provider-Specific Consumer Signal Boosters. The FNPRM sought comment on whether to retain the “personal use” restriction for Provider-Specific Consumer Signal Boosters. Again, AT&T takes no position on this issue; however, AT&T does object to comments filed by CellAntenna and ACUTA.

In its comments, CellAntenna claims that it “has found that some of the carrier consents required by Section 20.21(c)(1)2, have been delayed or denied without consistency, and, in some cases, without explanation.” CellAntenna then “asks that the Commission consider and impose a process for the consents required by Section 20.21(c)(1), with a ‘shot clock’-a timeframe in which the wireless carriers must respond...”<sup>1</sup> ACUTA, in its comments, noted its support for the proposal to eliminate the “personal use” restriction for provider-specific consumer boosters. ACUTA went on, however, to urge “the Commission to remove that restriction for Wideband

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<sup>1</sup> Comments of CellAntenna Corporation (“CellAntenna”) at 1.

Consumer Boosters as well.”<sup>2</sup> The Commission should ignore CellAntenna’s request for a “shot clock” as well as ACUTA’s suggestion to extend the elimination of the “personal use” restriction to include wideband consumer boosters because these proposals are beyond the scope of the FNPRM.

The requests of CellAntenna and ACUTA were not proposed in the FNPRM and neither was raised by any other party. In addition, the grant of their requests is not directly germane to the relief sought with regard to provider-specific boosters.<sup>3</sup> Both suggestions are, then, beyond the scope of the FNPRM and are more properly the subjects of a new petition for rule making.

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<sup>2</sup> Comments of ACUTA at 1.

<sup>3</sup> *See, e.g.*, In the Matter of Amendment of Parts 2 and 97 of the Commission's Rules to Facilitate Use by the Amateur Radio Service of the Allocation at 5 MHz, ET Docket No. 10-98; RM-11353, Report and Order (November 18, 2011) at ¶ 42.

## Conclusion

For the foregoing reasons, AT&T urges the Commission to reject CellAntenna's request for a "shot clock" on the consents required pursuant to Section 20.21(c)(1) and to reject ACUTA's request to eliminate the "personal use" requirement for wideband consumer boosters. Both requests are outside the scope of the FNPRM.

Respectfully submitted,



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January 20, 2015