

**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 VERIZON¹

Verizon files these comments in response to Cell Antenna Corporation’s (“Cell Antenna”) request that the Commission adopt prescriptive rules governing licensee review and approval of requests for consent to install and operate industrial signal boosters.² As discussed below, that request is beyond the scope of the *Further Notice*³ and unnecessary.

Cell Antenna’s request is beyond the scope of this proceeding. In the *Further Notice*, the Commission sought comment on one particular issue pertaining to the “personal use”

¹ In addition to Verizon Wireless, the Verizon companies participating in this filing are the regulated, wholly owned subsidiaries of Verizon Communications Inc.

² In adopting rules for the design and operation of signal boosters, the Commission required that industrial signal boosters – boosters designed to cover large areas, serve multiple users, and be installed by licensees or qualified installers – may only be operated by licensees or with express licensee consent. *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*, Report and Order, 28 FCC Rcd 1663, 1702-04 (2013) (“*Booster Order*”).

³ *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*, Order on Reconsideration and Further Notice of Proposed Rulemaking, 29 FCC Rcd 11563 (2014) (“*Reconsideration Order*” or “*Further Notice*,” as appropriate).

requirement for provider-specific consumer signal boosters.⁴ In its initial comments, however, Cell Antenna asked the Commission to adopt prescriptive procedural requirements, including “shot clock” time periods, to govern licensee responses to requests for consent to install and operate industrial boosters.⁵ Issues concerning requests for consent to operate industrial signal boosters are outside the scope of the *Further Notice* and are not appropriately considered in this proceeding.

There is in any event no need for the Commission to consider at this time a shot clock or other procedural rules for licensee consent to operate industrial signal boosters. Verizon, for example, has established a process for reviewing and acting on requests to approve industrial boosters. In the almost two years since the *Booster Order* was adopted, Verizon is not aware of any problems with this process. Neither Cell Antenna nor any other entity has raised any such problems with Verizon.

Cell Antenna alleges that some carriers have either ignored or been slow to respond to requests for carrier consent to install and operate industrial signal boosters.⁶ Although it provides a handful of examples of consent requests where one or more licensees allegedly either denied consent or had not yet consented to requests to operate industrial signal boosters,⁷ there is not enough information about these examples to warrant initiating a further rulemaking to

⁴ *Id.* at 11570-71, ¶¶ 25-28.

⁵ Cell Antenna Comments, WT Docket No. 10-4 (Dec. 29, 2014) at 6-7.

⁶ *Id.* at 5.

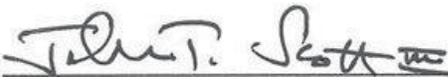
⁷ See Letter from Marjorie K. Conner, attorney for Cell Antenna, to Marlene H. Dortch, Secretary, Federal Communications Commission, WT Docket No. 10-4 (Oct. 17, 2014).

consider additional rules.⁸ However, in an effort to ensure that consent requests are handled appropriately, Verizon plans to contact Cell Antenna to resolve any issues with outstanding requests it may have with Verizon and to provide Cell Antenna with information about Verizon's industrial booster review and approval process to avoid issues going forward.

For these reasons, the Commission should deny Cell Antenna's request to adopt procedural rules governing industrial signal booster consent requests.

Respectfully submitted,

VERIZON

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⁸ For example, consent might reasonably be delayed if booster system design changes were needed to avoid interference. In such situations, consent would not be given until necessary changes were made and approved.