

April 29th, 2015



Ms. Marlene Dortch
Secretary
Federal Communications Commission
445 12th Street, N.W.
Washington, DC 20554

*Re: Terrestrial Use of the 2473-2495 MHz Band for Low-Power Mobile Broadband
Networks– IB Docket No. 13-213*

Dear Ms. Dortch:

Theatro Labs, Inc., an internet-of-things (IoT) company with operations throughout the United States, enthusiastically supports the Commission's proposed rules for low power mobile broadband (or terrestrial low power service, TLPS) in the 2.4 GHz band. We have pioneered the use wearable computers that operate only over Wi-Fi networks to provide in-store communications for companies in the retail and hospitality market segments. Our products help retailers increase efficiency operations by simplifying in-store mobile workforce communications. Our wearable computers and back-end SaaS equipment use Wi-Fi data links to give employees access to product and service information while staying in direct communication with managers and each other. Theatro's platform also gives retailers unprecedented analytics, predictive modeling and detailed operational data to improve store performance.

We have followed the Commission's 2.4 GHz proceeding since late 2014 because we believe the new rules provide an attractive alternative for Theatro's customers. Theatro's mobile solutions rely on Wi-Fi operations [or 802.11 devices] in the 2.4 GHz band. While 5 GHz is a vitally important band for communications, its in-store range limitations can make it less than optimal for our applications. In contrast, the 2.4 GHz band provides us with sufficient coverage throughout large and small customer sites. The 2.4 GHz band is congested, however, and performance quality suffers in crowded environments. Given this congestion, which will worsen when the number of IoT devices soars above today's nearly five billion, Theatro and its customers would benefit from the quickly deployable, clean quiet channel the Commission would make available with its new 2.4 GHz rules.

Theatro believes that, after two and a half years, the facts are in: TLPS will not disrupt other offerings in the 2.4 GHz band. The proposed 2.4 GHz rules are an exciting example of the Commission's continued work to free up additional spectrum for broadband. We encourage the FCC to adopt its rules without further delay.

Sincerely,

Chris Todd
CEO