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Regarding section 46 of 15-92 and the proposal to expand the scope of the SDR-related requirements:

I personally use OpenWrt on my home wireless router because it provides more capabilities than the firmware that came pre-installed. It also has a consistent interface, so I didn't have to re-learn how to configure my router when I upgraded. This gave me a lot more choice when upgrading—I didn't have to worry about staying with the same manufacturer to avoid losing certain capabilities or having to learn a new interface. Also, OpenWrt, being open source, encounters far fewer vulnerabilities than manufacturer firmwares, and existing vulnerabilities are fixed quicker, meaning my home network stays more secure.

Not being able to install OpenWrt on most/all newer devices will make setting up my home network far more frustrating the next time I upgrade my hardware. And on a broader scale, it'll stifle competition—upstart manufacturers will have trouble selling their solutions because businesses won't want to migrate to new software. If OpenWrt eventually becomes defunct because no new devices support it, then the situation will be even worse, because new manufacturers won't have a reference point to base their firmwares off of. So these new regulations are actually very anti-competitive given the place open-source firmwares like OpenWrt play in the market.

Another consideration is that not allowing open-source firmwares means that end users can't be certain of what's running on their devices. Given that the NSA has previously intercepted and modified new routers en route to users (<http://arstechnica.com/tech-policy/2014/05/photos-of-an-nsa-upgrade-factory-show-cisco-router-getting-implant/>), users need to be able to install their own firmware to avoid being (illegally) surveilled.

Allowing end-users to install open-source firmwares is really important. Please don't broaden the restrictions on custom firmwares, and please consider reversing existing restrictions.

Regards,  
Kerrick Staley