

Before the Federal Communications Commission
Washington, DC 20544

In the Matter of

Amendment of Parts 0, 1, 2, 15 of the)	
Commissions Rules regarding)	
Authorization)	ET Docket No. 15-170
of Radio-frequency Equipment)	
for Wireless Devices)	
)	
)	
Request for Allowance of Optional)	
Electronic Labeling)	RM-11673
for Wireless Devices)	

Although there is understandable concern over the control of Part 15 use of these devices, the Amateur Radio community has been successful in re-purposing these devices to create a viable backup communications system that will work during natural disasters or terrorist attacks.

Widespread outages (cell phone, internet) that accompanied Superstorm “Sandy” and the “Boston Marathon” explosion revealed lingering weakness in our wireless infrastructure. We live in a wireless digital world and the vulnerability of our networks is magnified by the declining use of landlines.

The Amateur Radio community will find that providing a viable backup communications system prohibitively expensive without the options of re-purposing existing equipment.

Unless there is an exemption for Part 97 use, the proposed amendments to the Commissions Rules will have an adverse effect on the Amateur Radio community's ability to provide support and communications during and after a catastrophic event when it may take days for emergency help to arrive. Lives may be lost and recovery efforts hampered.

Respectfully submitted:

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