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Public Comments on Equipment Authorizations:========

Title: Equipment Authorizations

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Comment: I would like to join many other members of the wireless technology community in urging the FCC not to implement any rules that limit the ability of end-users to modify WiFi radio software. Our research and development work at DataSoft -- including work for the federal government -- depends on our ability to change radio device software. Other users could be prevented from fixing bugs or security holes in their wireless hardware, even if these bugs caused the radio to violate other FCC rules. Furthermore, DataSoft is also a producer of wireless hardware, and we as a small business would be unfairly harmed by unnecessary new regulations on device software. The entire market for Software Defined Radio (SDR) is predicated on easily modifiable radio software.

I am aware that illegal operation in unlicensed bands can be a serious problem, but I have not seen any evidence that open-source firmware has caused any more interference than vendor-locked firmware. Aren't existing rules limiting types of interference sufficient? And less prone to unintended consequences than rules limiting methods of modification? Please reconsider any language in the

proposed rules that would effectively require device manufacturers to prevent previously acceptable modification of wireless radios.

Luke Ritchie, PhD

DataSoft Corp

Tempe, AZ

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