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Via ECFS

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

**Re: Ex Parte filing of Kathrein Automotive GmbH & Co. KG
Request for Waiver of Section 20.21, WT Docket No. 10-4**

Dear Ms. Dortch:

On September 30, 2015, representatives of Kathrein Automotive GmbH & Co. KG (“Kathrein”) met with the following FCC staff regarding Kathrein’s request for waiver of Sections 20.21(e)(5), 20.21(f)(1)(3), and 20.21(f)(1)(4) of the Commission’s rules in order to market an automotive OEM signal booster: Roger Noel, Amanda Huetinck, and Moslem Sawez of the Mobility Division, Wireless Telecommunications Bureau, and Sean Conway, Legal Advisor, Office of the Bureau Chief, Wireless Telecommunications Bureau. Attending the meeting on behalf of Kathrein were: Ralf Bösche, Director of Engineering, Kathrein Automotive; Thomas Schuhbeck, Senior Engineer, Kathrein-Werke KG; Daniel Michael, NA Sales and Operations Manager, Kathrein Automotive USA; Peter Nevermann, Director of Services for Cetecom (by phone); Jonathan Markman and the undersigned of Fletcher, Heald & Hildreth, PLC.

During the meeting, the parties discussed the attached materials. Kathrein representatives also presented the device and system components, demonstrating how installation would protect wireless networks by preventing consumer modifications that could create oscillation. Kathrein highlighted the safety benefits of the device and discussed how consumers may shut off the device.

Kathrein emphasized that the waiver request was narrowly focused, as it would only apply to OEM devices permanently installed in vehicles, and that the device uniquely required a “wake up signal” before any downlink reception or uplink transmissions could occur. Kathrein additionally explained why the opposition was mistaken in their characterization of the device and its potential for causing interference. And Kathrein discussed how the cost and design difficulties inherent in full compliance were potentially prohibitive to bringing this technology to the U.S. market without waiver.

Respectfully Submitted,



Laura A. Stefani

Attachment

FCC Equipment Certification for the Kathrein Compensator

Docket No. 10-4

KATHREIN-WERKE KG



The Kathrein Compensator is a Novel Application of Technology

- Unique in that it is the only booster to require a “wake up signal” (a feature of the cradle) to amplify
- The only OEM consumer signal booster
- The only consumer signal booster permanently installed in an automobile
- The anti-oscillation rules were not created for this type of device and the “safety valve” of the waiver procedures is required

Meets the Commission's Goals of Fostering Technological Innovation and is in the Public Interest

- Would open the U.S. market to a new type of booster technology (already available in Europe and China)
- Provides optimal technology and performance for an automobile installation, due to professional installation and optimized external antenna
- Promotes the Commission's goals of improving widespread access to mobile voice and broadband
- U.S. consumers should not incur additional costs for including a technology that is unnecessary

The Opposition Misunderstands the Device

- Integrated system: combination of low system gain & defined vehicle installation prevents oscillation
- Consumers can immediately turn off the device
- There would be no benefit to consumers altering the equipment
- Collisions will not cause network interference
- Past booster interference issues related to 60 dB non-cradle type boosters
- The anti-oscillation waiver is a very narrow exception of the rules
- The labeling waiver tracks precedent
- The underlying purpose of the rule – to protect network providers – will be assured

THANK YOU!

Ralf Bösche, Director of Engineering, KATHREIN Automotive GmbH & Co KG

Thomas Schuhbeck, Senior Engineer, KATHREIN-Werke KG

Daniel Michael, NA Sales and Operations Manager, KATHREIN Automotive USA Inc.

Peter Nevermann, Cetecom GmbH

Laura Stefani and Jon Markman, Fletcher, Heald & Hildreth, PLC