

Please Do Not Reply To This Email.

Public Comments on Equipment Authorization and Electronic Labeling for Wireless Devices:=====

Title: Equipment Authorization and Electronic Labeling for Wireless Devices

FR Document Number: 2015-18402

RIN:

Publish Date: 8/6/2015 12:00:00 AM

Submitter Info:

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Organization Name: Dude INC

Comment: This proposal suits only manufacturers and does nothing to protect people or govt from any abuse of devices with radio transmitters. I am an avid user of a software based on linux that I use in my routers called DDWRT. DDWRT was made because manufacturer could not make software stable enough on many consumer level routers and for that matter commercial grade either.

Taking away the ability to upgrade/modify or otherwise change a devices function just because of abuse will not stop abuse. Those who wish to do harm will still do it and it will only stop the average geek from getting there hardware to work like they want it to work.

These modifications are not for the faint of heart or the layman those who do these types of mods are just looking for better performance or performance they expected when they bought the hardware.

I suspect this proposal was brought forward by Cisco systems, netgear, belkin or dlink to secure market share they see shrinking do to consumers being able to modify a cheap 802.11 device to perform tasks a device that costs nearly \$600 can do. Its almost always about the money. So do the right thing here FCC. STOP BIG MONEY 1 MORE TIME FOR THE CONSUMER.

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Publish Date: 8/6/2015 12:00:00 AM

Submitter Info:

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Organization Name:

Comment: I cannot, in polite company, adequately convey how vehemently I oppose this proposed rule. It is, aside from being a terrible idea, in direct conflict with the fourth amendment to the United States constitution. I own my router, and the federal government is expressly forbidden by its charter from depriving me of any part of that property right without due process of law. I have not used my property to break any rule of the FCC, and depriving me of the right to install a more secure firmware, in the absence of any conviction, is a clear violation of my fourth amendment right to due process.

There are a great many legitimate reasons for replacing the firmware on a home router. I'd like to focus, though, on just one: From a security engineering standpoint, time has proven the commercial providers utterly incompetent. Every single major home router manufacturer has a proven track record of shipping devices with such severe vulnerabilities that I would NEVER even CONSIDER using one without replacing its firmware wholesale within 3 minutes of plugging it in.

Aside from being a violation of consumer rights and placing consumers at unnecessary risk without legal recourse, this ruling is completely unnecessary AND ineffective.

Unnecessary because it is already illegal for consumers to use their devices to broadcast in unauthorized bands. Open-source router firmwares incorporate these rules by default already - a user must willfully choose to misconfigure their router in order to break them. We wouldn't accept the outlawing of water because of the potential for waterboarding or intentional drowning - those things are already illegal.

Ineffective because a dedicated hobbyist can ALREADY purchase an off-the shelf SDR system or create devices from scratch that violate these rules, and this ruling would almost certainly be the impetus to crystallize one or more projects around the construction of a fully-open-source home router. Very few users who, today, run DD-WRT on hardware that is at least engineered for compliance on the RF side will have any qualms about running DD-WRT on unlicensed home-brew hardware, especially when the perception is that the only reason it's not licensed is that the FCC have made themselves the enemy of the American consumer.

Finally, consider the group of individuals you propose alienating. A significant subset of DD-WRT and OpenWRT users are hobbyists with an interest in cybersecurity, colloquially known as "hackers". The majority are law-abiding citizens who have no interest in the criminal activities unfortunately associated with the word. These are, however, people who live the majority of the lives on the internet and consider themselves citizens of the Internet AND the United States. This proposed rule is very insensitive toward them, and is already being perceived by many as a direct assault on them personally. It would be valuable before deciding on this rule to spend some time listening to Mudge's

stories of culture clash between the government and hacker worlds, in particular his DEFCON 21 presentation "Unexpected Stories From a Hacker Inside the Government". This is a subculture we should be encouraging, not alienating, because this is the core of our broader culture that is driving technological innovation and motivating our youth to pursue intellectual challenges and develop engineering expertise.

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State or Province: AZ

ZIP/Postal Code: 85260

Email Address:

Organization Name:

Comment: Please do not continue with the proposal that takes away the ability for users to install the software of their choosing on their computing devices.

\*The ability to use custom software on laptops, phones, routers, and other devices actually allows users to improve security and better protect and control their privacy.

\*Many Manufacturers release products that have security holes which they are slow, or even outright refuse, to to fix.

\*The ability to install custom software has enabled users to find and fix problems outside of just security issues.

\*Businesses as well as individuals install custom software on their computers to help properly manage their infrastructure. Preventing this limits their ability to locate the right hardware/software combinations for their businesses to run efficiently.

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Country: United States

State or Province: WA

ZIP/Postal Code: 98506

Email Address: kf7mjf@gmail.com

Organization Name:

Comment: Please do not allow this rule to pass. It would greatly hinder, if not do away with the installation of custom operating systems, or user modification of their personal devices. It would become impossible or nearly so to use custom Android ROMS, or to even install Linux on a desktop computer or server. Business and private users would be at the mercy of the device manufacturer to maintain software and patches, and many otherwise usable devices could become useless simply because the manufacturer refuses to maintain the software. This action would be bad for business, and consumer rights.

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Submitter Info:

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State or Province: IN

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Organization Name:

Comment: This sort of rule would significantly limit the ability of entrepreneurs to innovate and limit the field of mobile devices to only labs corporate entities. That would decrease the speed of innovation, decrease product development, and have an overall negative impact on the industry. Building and modifying existing devices had a long tradition in American innovation, and if should be allowed to continue.

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Submitter Info:

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Last Name: Anderson

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Country: United States

State or Province: CA

ZIP/Postal Code: 93444

Email Address:

Organization Name:

Comment: No way! Corporate overreach in the digital realm is far, far out of bounds already. We, the public, have a right to own our equipment completely. It's "we the people" not "them the consumers" get a clue FCC.

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Last Name: Cupstid

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Country: United States

State or Province: MN

ZIP/Postal Code: 55379

Email Address: gene.cupstid@gmail.com

Organization Name:

Comment: Please do not consider locking down firmware for wifi routers. Vendors can't be trusted to continually patch a router for it's entire lifetime. I purchased the device and I should be able to install the secure firmware of my choice. Please do not erode my freedom any more than it already has been.

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ZIP/Postal Code: 76579-3249

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Organization Name:

Comment: If this proposal passes, it must also be required that manufacturer's support the device forever. Not for some period of years and then drop it, but forever.

Releasing a device, then dropping support for it in the near future is tantamount to theft.

In this era of surveillance, and company's showing their inability to support devices adequately, being able to flash devices with custom made and open source software is a near necessity to get anything useful done as a home consumer who is also a power user (read: technical person who wishes to do more than the average person with their devices).

This hurts far more than it helps. And it is absurd, and I would even say asinine, to consider this proposal

Sure people won't be able to boost their WiFi signal to a damaging or interfering wattage, but then consumers would lose tons of features offered by the open source community.

I'd rather have interference with those features than none without them. By a long shot (read: significantly so).

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Organization Name: n/A

Comment: This is an action that should not be taken, allowing companies to lock down wireless radio devices is as anti-consumer as can be. In order for wi-fi technology to continue to develop, it must remain open source and unlocked, or no innovation for the sake of innovation will be made. Locking the devices will also prevent end users with significant knowledge from making edits to software that can fix potentially catastrophic bugs, glitches, and repeatable errors that can sometimes slip through a company's quality assurance stage.

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Last Name: clifton

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Country: Australia

State or Province: Victoria

ZIP/Postal Code: 3212

Email Address:

Organization Name:

Comment: No. Devices should always be able to be easily modified.

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Submitter Info:

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City: Chandler

Country: United States

State or Province: AZ

ZIP/Postal Code: 85248

Email Address: finchkky@hotmail.com

Organization Name:

Comment: Given that third party alterations on devices with wifi devices tends to result in a more secure environment, it would be counter productive to restrict installation of alternative systems.

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Submitter Info:

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Last Name: Gross

Mailing Address: 2801 B Shasta View Dr

City: REDDING

Country: United States

State or Province: CA

ZIP/Postal Code: 96002

Email Address: Gross.steven.a@gmail.com

Organization Name:

Comment: This is a propustorus idea, that is bad for consumer, businesses, and just a violation of buyers rights. It's essential ly making it so you a a consumer are merely "leasing" the product. This will halt and slow down tech progression in the long run and sale in the short term. Over all a stupid idea.

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Submitter Info:

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Country: United States

State or Province: IN

ZIP/Postal Code: 47404

Email Address: jwcrawley@gmail.com

Organization Name: Amateur radio, part 97

Comment: I am Joshua Crawley, amateur radio operator KC9JEF. I sincerely urge you to not implement rules that take away our ability to install the software of our choosing on our computing devices. I use predominantly Open Source software known as Linux to conduct my day to day computing, as well as furthering the state of the radio art.

The proposed rules will make Linux obsolete by requiring companies to hide the way the wireless devices communicate, and make drivers nonexistent. And this is very bad.

I have worked extensively in Linux wireless on the LinkSys WRT54G home routers. With those, we have developed ways of sustaining communication links, whilst holding overall 2.4GHz bandwidth and peak emitted power lower than the standard firmware set.

Locking the firmware and removing it from our observation would remove a crucial ability of us amateur radio operators to continue researching and advancing the state of the art. We would be at the mercy of the select few allowed.

Also, during our research, we amateurs have found bugs and errors in the code (software as well as firmware) that the manufacturers have refused to fix. For that, we the community have fixed their hardware. With the proposed locks, we would not be able to fix broken hardware.

This rule also proposes to dumb down digital radio in this country, by making hardware hard to tinker with, as well as putting the price for the real "open" hardware at exorbitant prices. This retards growth and advancement of the art and the sciences of radio.

To put it bluntly, this affects each and every one of our freedoms, starting with the freedom of speech. How I choose to modulate my radio is an extension of my speech. These controls seek to squelch my voice to nothing except "approved communications". And these laws also want to cut down on thoughts as well as speech. And that is sad, coming from the greatest country in the world.

I urge you to oppose all restrictions on computing devices.

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State or Province: OR

ZIP/Postal Code: 97213

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Organization Name:

Comment: What next make it impossible for me to change the oil in my car.

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Submitter Info:

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Last Name: Jensen

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Country: United States

State or Province: CO

ZIP/Postal Code: 81501

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Organization Name:

Comment: I think that adding these new rules is a terribly bad idea. But consolidating existing rules is ok. The new rules prevent people from experimenting with advanced wireless network topography, something that is very important to learn more about in areas that lack high speed internet, and in areas that are not wired. I understand that this entire rule is to try to prevent people from doing one of two things:

1. Hacking wifi.
2. jamming wifi.

What you are losing is the following:

1. Mesh networking: currently being developed, and if we ever move to a fully automated highway, mesh networking is going to help our cars not hit each other.
2. Open source wifi firmware that is able to support better encryption and algorithms to defend from real threats like hackers.
3. Figure out novel methods to fix bufferbloat at a firmware level. Ever had a youtube video load a chunk, and just when it got to the end, it loaded the next chunk? Don't you wish it loaded the next chunk when you were halfway through your current chunk of video instead of at the end of your current chunk so that on slower connections, no choppiness would appear? That is a bufferbloat problem.
4. Figuring out how to multiplex data over multiple wireless connections effortlessly. Have you ever had a neighbor who had slow internet, and you had slow internet and you wished you could combine their power so that during the day you could use 2x as fast and at night he could use 2x as fast? That is a problem I am working on personally, and I am modifying firmware to do it. Banning people from modifying wireless firmware would lose the ability forever to combine streams of data to get better streams and network speeds. Basically peering agreements for the little guys.

I will address the hacking of wifi first.

The answer to hackers is better algorithms, encryption and better digital defenses, not attempting to outlaw them and thinking they will obey your laws.

If somebody wants to break into your wireless network, and they are a hacker, they are going to either make or buy required tools (from overseas if necessary). It is just like attempting to stop gun violence by instituting gun laws and then not enforcing them. Although you can certainly tell when gun violence has been committed, it is difficult to ascertain when someone breaks into your wifi connection. What is worse, it is a false sense of peace, seeing that people who really want to hack, will still hack, and simply making a law only makes people feel safer if it is not widely enforced in a draconian manner. Especially because setting up a wifi honeypot would still be doable.

2. Jamming. Although hacking wifi is bad, jamming is worse. Currently, if people are jamming, they are fined. Alot of

money. However, you don't need sophisticated hardware to jam a gps signal. A spark welder attached to antenna works just fine, and jams in a large radius too!

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Submitter Info:

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Last Name: Yoon

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Country: United States

State or Province: NY

ZIP/Postal Code: 11377-3051

Email Address:

Organization Name:

Comment: Do not implement rules that prevent users from installing the software of their choosing on their own computing devices.

Such rules and restrictions will harm American security. All too often, manufacturers choose not to repair security holes in their devices. Americans need the ability to repair such security holes on their own.

Similarly, serious bugs in wireless communication drivers remain unaddressed by manufacturers. Users regularly fix serious bugs in their wireless drivers; an action which would be banned under this proposal.

Restrictive rules will harm business and technological research. Commerce worth billions of dollars, such as secure wifi vendors and retail hotspot vendors, requires the ability for users and companies to install custom software of their own choice. Networking researchers need the ability to investigate and modify their devices.

Lastly, disaster response relies upon the ability of amateur radio operators to create high powered mesh networks to assist emergency personnel. This proposal would sacrifice lives by crippling the capability of Americans to immediately respond to emergency situations.

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Submitter Info:

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Last Name: Mazur

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Country: United States

State or Province: NJ

ZIP/Postal Code: 08857

Email Address:

Organization Name:

Comment: This proposal is highly misguided as it suggests that an entire device must be locked down just because one separate component has the possibility of breaking FCC regulations, it would be a much more logical solution to just lock down the individual component (Wireless Network antenna/adapter).

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Submitter Info:

First Name: Connor

Last Name: Alexander

Mailing Address: 19 Montrose Manor Court

City: Catonsville

Country: United States

State or Province: MD

ZIP/Postal Code: 21228

Email Address: Calex3@umbc.edu

Organization Name:

Comment: Public servants of the Federal Communications Commission,

It is with great concern that I write you today regarding the latest proposal to restrict free use and research by private citizens of alternative wireless and computing systems.

The ability for private citizens alongside, but not in conjunction with, federally approved researchers to conduct their own research and use of any and all methods of electronic communication is paramount to the future progress of technological advancement of this very necessary field of technology.

On the subject of liberty it is not at all acceptable that, given we live in a free society, our use of technology should be dependent upon federal approval of certain manufacturer's technology nor should our separate but intersecting third party devices be limited by some arbitrarily concocted regulations. It is not within the federal government's powers or mandate to codify specific software and hardware solely on the basis that it lies outside standard mainstream consumer products. Further, information security is paramount in today's world and often alternative operating systems offer a higher degree of internal systems security not found in most popular and conventional forms of consumer products. The FCC could find itself in quite a precarious position should a large number of citizens find their data in the hands of unscrupulous individuals which could have been averted were they able to use alternative technology systems but were denied due to the FCC's own regulatory measures.

Americans must also be able to secure their own data when the companies we rely on abstain from patching their own security flaws. That the FCC would be considering a proposal which could leave private citizens at the mercy of individuals operating outside the boundaries of the law is worrisome to say the least and in the past it has often been the case that privacy gaps and security flaws in wireless hardware which transmits sensitive data has been fixed as a result of the efforts of private individuals. This and many similar actions would be banned under the NPRM.

The FCC may also run afoul of the First Amendment to the Constitution by limiting those citizens who seek to use alternative methods and hardware to transmit wireless data as a matter of political principals and the desire to express political dissent through legitimate consumption practices. The NPRM would stifle this very legitimate speech, protected under the First Amendment, and may find itself on the wrong side of Constitutional Law and Supreme Court precedent.

I hope my words have not been met by deaf ears and the Federal Communications Commission takes seriously the implications of this very dangerous precedent being set should this regulatory measure come into effect. I am confident in the FCC's ability to make the right choice by setting aside this regulatory measure and hanging it up in the "extremely

bad" category of regulatory ideas.

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Submitter Info:

First Name: Mike

Last Name: Lowry

Mailing Address: 12345 no way lane

City: san antonio

Country: United States

State or Province: TX

ZIP/Postal Code: 78218

Email Address:

Organization Name:

Comment: Please do not implement any law that will limit our ability as consumers to do what we please with products that we have purchased, including but not limited to:

Prevent Us from Installing and configuring our own software and firmware on the devices

Restricting our ability to replace factory offered software with our own versions

Restricting our ability to modify factory settings

thanks!

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Submitter Info:

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State or Province: GA

ZIP/Postal Code: 30309

Email Address: nrofchalk@gmail.com

Organization Name:

Comment: I am respectfully asking the FCC to not implement rules that take away the ability of users to install the software of their choosing on their computing devices. Additionally, I would like to emphasize that wireless networking research depends on the ability of researchers to investigate and modify their devices and Americans need the ability to fix security holes in their devices when the manufacturer chooses to not do so. For example, users have in the past fixed serious bugs in their wifi drivers. These actions would be banned under the NPRM. Billions of dollars of commerce, such as secure wifi vendors, retail hotspot vendors, depends on the ability of users and companies to install the software of their choosing.

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State or Province: NH

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Organization Name:

Comment: If you are going to add restrictions in regards to the usability of RF devices, please try to limit the law amongst the software that can be installed. You're giving this industry a dangerous amount of power that could potentially be abused to affect underlying methods like the Operating System of a computer, as well as general large changes to the software. This seems to indicate that you are not in favor of open-source projects (Linux being a huge one), which I assume has something to do with telemetry and tapping in via surveillance. So you shouldn't do that, even though I know what the government wants.

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State or Province: WI

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Organization Name:

Comment: Default settings are ALWAYS insecure. Preventing changes is an invitation for everything to be hacked. Literally everything. In addition, security flaws can't be corrected through updates/patches the physical hardware would need to be replaced. The icing on the cake is the fact that the open source community would be hurt and they provide the software that runs over half of the internet. Plus every super expensive router/firewall in every company would need to be replaced instead of a simple software update everytime a bug is found.

In summary...

Costs go way up.

Work goes way up.

Security goes way down.

This will enable even children to hack into secure systems for fun and cause chaos. It is scary just how easy it is if a flaw is discovered and is not patched.

Let IT Professionals do their job.

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Submitter Info:

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Organization Name:

Comment: By forcibly restricting via software or hardware means to limit radio transmission devices. Be it computers, cell phones, routers, wireless access points; will cause businesses; those who manufacture said devices, to further lock down everything on the given system. Giving various manufactures this power, would result in system wide lock downs under the guise of 'complying with the law'; and would over flow in to related devices that do not have radios built in to them. Eg: Desktop without a wireless card would be locked by the manufacture as it has the capability of having a wireless card.

People will always attempt to tamper with devices; while it is not ideal, wholesaling the requirement to lock down devices that have or could have wireless devices will be damaging over all to the end consumer. Manufactures would have no incentive to update the underlying software, and consumers who wish to update it; would be unable to do so.

As is in the current state; manufactures have very little incentive to update any code. And most do not. By allowing this to proceed manufactures will not update code; but instead push new(er) devices out on the consumer. And cost minded consumers will not want to upgrade, esp when the only benefit is a software revision.

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Country: United States

State or Province: OH

ZIP/Postal Code: 45812

Email Address: justin.s.fletcher@gmail.com

Organization Name:

Comment: I would like to respectfully ask the FCC to not implement rules that take away the ability of users to install the software of their choosing on their computing devices. Our (The consumer's) ability to fix security flaws and other problems are needed. If this was passed for cars it would be like buy a brand a car and changing the oil but only being able to buy the oil from the manufacturer. What about choice and freedom to choose the best that America can produce?

Just because I like Ford vehicles, does not mean that I like Ford brand spark plugs, oil or other parts. Say I buy a new pair of shoes and would like to put a padded insert, but the company says that I can only put their inserts in them. How many jobs would be lost from companies like Dr. Scholls and many others shutting down. It makes sense only for the manufacture of the product. They can keep a monopoly on the software so us consumers are forced to use theirs and theirs alone. If this is passed than millions of dollars and possibly thousands of jobs would be lost. The ability to choose is a fundamental right for the consumer. Just 20 years ago, products were made for the consumer, not for the sole profit of companies. Products were made to be fixed by the people who bought them, made to last years and not be replaced when the next one came out. I don't want to buy a new product and the manufacturer decides to stop supporting it and I'm forced to buy a new one. Honestly, if this is passed the american people will end up paying a hefty price for it. This will only end up hurting the working class and will make the rich even richer.

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Public Comments on Equipment Authorization and Electronic Labeling for Wireless Devices:=====

Title: Equipment Authorization and Electronic Labeling for Wireless Devices

FR Document Number: 2015-18402

RIN:

Publish Date: 8/6/2015 12:00:00 AM

Submitter Info:

First Name: joe

Last Name: pont

Mailing Address: 211 pine hill road

City: wood river junction

Country: United States

State or Province: RI

ZIP/Postal Code: 02894

Email Address: joepont@gmail.com

Organization Name:

Comment: Fcc please let people install and use devices as they choose on their devices. People should be allowed to use devices as they choose. I feel this is a major threat to how people use their electronics. This would not be good for freedom. Thank you

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Title: Equipment Authorization and Electronic Labeling for Wireless Devices

FR Document Number: 2015-18402

RIN:

Publish Date: 8/6/2015 12:00:00 AM

Submitter Info:

First Name: Michael

Last Name: Miloff

Mailing Address: 82 Sherwood Lane

City: West Seneca

Country: United States

State or Province: NY

ZIP/Postal Code: 14224

Email Address:

Organization Name:

Comment: I oppose the new rule as they limit a user's freedom to install the software of their own choosing and limit the ability of security researchers to check for vulnerabilities in networking devices which makes us all more vulnerable. The new regulations will stifle innovation in open source software which makes up much of the Android OS (<https://source.android.com/>), the base of Mac OS X <https://www.apple.com/opensource/>, and Linux Distributions that run much of the internet including facebook.com and google.com.

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Publish Date: 8/6/2015 12:00:00 AM

Submitter Info:

First Name: matthew

Last Name: ramsey

Mailing Address: 851 ted a crozier blvd

City: clarksville

Country: United States

State or Province: TN

ZIP/Postal Code: 37043

Email Address:

Organization Name:

Comment: While it is understandable that there may be a necessity to govern RF devices, i don't think there is any benefit to to controlling the hardware surrounding it.

Additionally, man will always want to play and take apart, as is the reason behind building a pc. We should not proactively make rules assuming hardware and software will be abused

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RIN:

Publish Date: 8/6/2015 12:00:00 AM

Submitter Info:

First Name: Raymond

Last Name: Stevens

Mailing Address: 90 Annette Place

City: Middletown

Country: United States

State or Province: CT

ZIP/Postal Code: 06457

Email Address:

Organization Name:

Comment: Sections A.b, 3.c, and 3.d are burdensome, impractical, and chilling.

Security researchers would be locked out of systems and unable to study the security, safety, and stability of RF devices that the FCC approves and now proposes to make even more difficult to ensure their safety, in an ironic twist.

Home prototypers and 'makers' would be burdened by this proposal. This proposal would also serve to help cripple aftermarket retailers who do hundreds of millions of dollars in business each year.

Consumer freedom and choice would be hampered by this proposal. The ability to control the systems they own could be locked down in entirety and the American consumer locked out under the excuse of the simple non-threatening guise of "radio security".

The FCC should ask itself: is this really something the Commission should concern themselves with, of all the other more pressing issues? Or is this a backdoor attempt by large industry players to further stamp out third party innovation, bad press for security flaws, and consumer freedom?

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Publish Date: 8/6/2015 12:00:00 AM

Submitter Info:

First Name: Harold

Last Name: Shepherd

Mailing Address: 228 stone creek lane

City: valparaiso

Country: United States

State or Province: IN

ZIP/Postal Code: 46383

Email Address:

Organization Name:

Comment: Quit trying to stifle advancement of technology against users for your corporate donors.

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Title: Equipment Authorization and Electronic Labeling for Wireless Devices

FR Document Number: 2015-18402

RIN:

Publish Date: 8/6/2015 12:00:00 AM

Submitter Info:

First Name: Michael

Last Name: Cox

Mailing Address: 10 High Street

City: North Sydney

Country: Canada

State or Province: Nova Scotia

ZIP/Postal Code: B2A 2A4

Email Address: mj\_cox@outlook.com

Organization Name:

Comment:

\*\*\*COPY-PASTED MESSAGE\*\*\*

Public servants of the Federal Communications Commission,

It is with great concern that I write you today regarding the latest proposal to restrict free use and research by private citizens of alternative wireless and computing systems.

The ability for private citizens alongside, but not in conjunction with, federally approved researchers to conduct their own research and use of any and all methods of electronic communication is paramount to the future progress of technological advancement of this very necessary field of technology.

On the subject of liberty it is not at all acceptable that, given we live in a free society, our use of technology should be dependent upon federal approval of certain manufacturer's technology nor should our separate but intersecting third party devices be limited by some arbitrarily concocted regulations. It is not within the federal government's powers or mandate to codify specific software and hardware solely on the basis that it lies outside standard mainstream consumer products. Further, information security is paramount in today's world and often alternative operating systems offer a higher degree of internal systems security not found in most popular and conventional forms of consumer products. The FCC could find itself in quite a precarious position should a large number of citizens find their data in the hands of unscrupulous individuals which could have been averted were they able to use alternative technology systems but were denied due to the FCC's own regulatory measures.

Americans must also be able to secure their own data when the companies we rely on abstain from patching their own security flaws. That the FCC would be considering a proposal which could leave private citizens at the mercy of individuals operating outside the boundaries of the law is worrisome to say the least and in the past it has often been the case that privacy gaps and security flaws in wireless hardware which transmits sensitive data has been fixed as a result of the efforts of private individuals. This and many similar actions would be banned under the NPRM.

The FCC may also run afoul of the First Amendment to the Constitution by limiting those citizens who seek to use alternative methods and hardware to transmit wireless data as a matter of political principals and the desire to express political dissent through legitimate consumption practices. The NPRM would stifle this very legitimate speech, protected under the First Amendment, and may find itself on the wrong side of Constitutional Law and Supreme Court precedent.

I hope my words have not been met by deaf ears and the Federal Communications Commission takes seriously the implications of this very dangerous precedent being set should this regulatory measure come into effect. I am confident in the FCC's ability to make the right choice by setting aside this regulatory measure and hanging it up in the "extremely bad" category of regulatory ideas.

\*\*\*END OF COPY-PASTED MESSAGE\*\*\*

\*\*\*Personally written message\*\*\*

This proposal is absolutely insane and should have been thrown in the trash. It is absolutely ludicrous that you would even consider it. Besides the fact that this proposal is literally insane and inane lets look at devices that are actually intentionally locked down to prevent things like piracy and freedom. iOS is a prime example of a device that is pretty locked down. Same with official android devices. Xbox 360's are locked down. Nintendo Wii's are locked down. Satellite TV is locked down yet still people can watch it for free. This proposal will do nothing except make it slightly harder for people to do. People will still do it, it will just make criminals out of electronics enthusiasts.

WE should have the right to chose which software we use and install on our devices. This proposal is nothing but an attack on FREE and open-source wares. It should be Illegal to lock down devices! Companies are intentionally forcing us to use the software that came with the device.

Lets look at South Korea. It is illegal to sell devices that have bloat ware pre-installed that you cannot uninstall. I think America and the FCC should follow this path and make devices more open and free. Why should it be against the law to install a certain firmware on my phone? As the owner of the device who paid money for it I should have the right to use which ever software I choose.

The only conclusion I can come up with is that you're being bribed to even consider this completely insane proposal. Please make the right decision and defend the freedom of consumers.

Thank you,

Michael Cox

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FR Document Number: 2015-18402

RIN:

Publish Date: 8/6/2015 12:00:00 AM

Submitter Info:

First Name: Harrison

Last Name: Krug

Mailing Address: 237 Russett Rd.

City: Chestnut Hill

Country: United States

State or Province: MA

ZIP/Postal Code: 02467

Email Address:

Organization Name:

Comment: Please do not implement this policy, as it is a disgusting affront to our personal liberties. Wireless networking research depends on the ability of researchers to investigate and modify their devices. Americans need the ability to fix security holes in their devices when the manufacturer chooses to not do so. Users have in the past fixed serious bugs in their wifi drivers, which would be banned under the NPRM. Billions of dollars of commerce, such as secure wifi vendors, retail hotspot vendors, depends on the ability of users and companies to install the software of their choosing.

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RIN:

Publish Date: 8/6/2015 12:00:00 AM

Submitter Info:

First Name: John

Last Name: Lemme

Mailing Address: 9 Thunder Trail

City: Cranston

Country: United States

State or Province: RI

ZIP/Postal Code: 02921

Email Address:

Organization Name:

Comment: No, just no. I'm no linguist, so I'll copy the points made by librewiki:

Restrict installation of alternative operating systems on your PC, like GNU/Linux, OpenBSD, FreeBSD, etc.

Prevent research into advanced wireless technologies, like mesh networking and bufferbloat fixes

Ban installation of custom firmware on your Android phone

Discourage the development of alternative free and open source WiFi firmware, like OpenWrt

Infringe upon the ability of amateur radio operators to create high powered mesh networks to assist emergency personnel in a disaster.

Prevent resellers from installing firmware on routers, such as for retail WiFi hotspots or VPNs, without agreeing to any condition a manufacturer so chooses.

A law like this will cause far more problems and inconveniences than good.

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Publish Date: 8/6/2015 12:00:00 AM

Submitter Info:

First Name: Jessica

Last Name: Vanderhoff

Mailing Address: 182 Elkwood Ave Unit A

City: Imperial Beach

Country: United States

State or Province: CA

ZIP/Postal Code: 91932

Email Address: jessicavanderhoff@gmail.com

Organization Name:

Comment: This is a violation of personal freedoms, pure and simple.

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Publish Date: 8/6/2015 12:00:00 AM

Submitter Info:

First Name: Karl

Last Name: Pattyn

Mailing Address: 8060 Niwot Rd #28

City: Longmont

Country: United States

State or Province: CO

ZIP/Postal Code: 80503

Email Address: crazykarlpattyn@yahoo.com

Organization Name:

Comment: This proposed rule severely restricts the freedom of the individual concerning his or her own property. It allows companies to dictate how an individual can use his or her property, even when said property is no longer owned by the company. It hampers innovation and invention by restricting the freedoms to explore new avenues of technological improvement. This rule essentially enacts a dictatorship over the behavior and activity of people and their wireless technology, and should not be enacted. Please reconsider before making this a rule.

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Publish Date: 8/6/2015 12:00:00 AM

Submitter Info:

First Name: Rafael

Last Name: Meza Solorio

Mailing Address: 2001 Serenity

City: Medford

Country: United States

State or Province: OR

ZIP/Postal Code: 97504

Email Address: RMProductions26@gmail.com

Organization Name:

Comment: Public servants of the Federal Communications Commission,

It is with great concern that I write you today regarding the latest proposal to restrict free use and research by private citizens of alternative wireless and computing systems.

The ability for private citizens alongside, but not in conjunction with, federally approved researchers to conduct their own research and use of any and all methods of electronic communication is paramount to the future progress of technological advancement of this very necessary field of technology.

On the subject of liberty it is not at all acceptable that, given we live in a free society, our use of technology should be dependent upon federal approval of certain manufacturer's technology nor should our separate but intersecting third party devices be limited by some arbitrarily concocted regulations. It is not within the federal government's powers or mandate to codify specific software and hardware solely on the basis that it lies outside standard mainstream consumer products. Further, information security is paramount in today's world and often alternative operating systems offer a higher degree of internal systems security not found in most popular and conventional forms of consumer products. The FCC could find itself in quite a precarious position should a large number of citizens find their data in the hands of unscrupulous individuals which could have been averted were they able to use alternative technology systems but were denied due to the FCC's own regulatory measures.

Americans must also be able to secure their own data when the companies we rely on abstain from patching their own security flaws. That the FCC would be considering a proposal which could leave private citizens at the mercy of individuals operating outside the boundaries of the law is worrisome to say the least and in the past it has often been the case that privacy gaps and security flaws in wireless hardware which transmits sensitive data has been fixed as a result of the efforts of private individuals. This and many similar actions would be banned under the NPRM.

The FCC may also run afoul of the First Amendment to the Constitution by limiting those citizens who seek to use alternative methods and hardware to transmit wireless data as a matter of political principals and the desire to express political dissent through legitimate consumption practices. The NPRM would stifle this very legitimate speech, protected under the First Amendment, and may find itself on the wrong side of Constitutional Law and Supreme Court precedent.

I hope my words have not been met by deaf ears and the Federal Communications Commission takes seriously the implications of this very dangerous precedent being set should this regulatory measure come into effect. I am confident in the FCC's ability to make the right choice by setting aside this regulatory measure and hanging it up in the "extremely

bad" category of regulatory ideas.

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Submitter Info:

First Name: Joshua

Last Name: kolb

Mailing Address: 835 N Salina St

City: Syracuse

Country: United States

State or Province: NY

ZIP/Postal Code: 13208

Email Address: joshkolb@gmail.com

Organization Name:

Comment: There is no way to secure a device completely, with most devices not receiving security updates for extended periods of time. We need to be able to modify our devices to enhance security as no company will give security updates forever.

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Publish Date: 8/6/2015 12:00:00 AM

Submitter Info:

First Name: Adam

Last Name: Bahe

Mailing Address: 60 E. Monroe Unit 1507

City: Chicago

Country: United States

State or Province: IL

ZIP/Postal Code: 60603

Email Address: adambahe@gmail.com

Organization Name:

Comment: This sounds exceedingly extreme for what I'm sure are edge cases. Never in my life has any modular wireless radio been modified in such a way that affects me. I'm currently sitting in downtown Chicago, living in a 73 story residential building. Smack dab in the middle of the Loop. I'm surrounded by literally \_hundreds\_ of wireless radios. None of which are impeding upon my use of anything, licensed or not.

I'm sure there are some edge cases, but I think currently we do a very good job at figuring out how to deal with them or finding out who is causing them.

This just seems like bringing down an iron fist on a fringe problem. I am 100% against it. And this is coming from a 15 year IT professional. I currently work for a prop trading firm which heavily relies on wireless microwave transmission from Chicago to NYC.

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Publish Date: 8/6/2015 12:00:00 AM

Submitter Info:

First Name: David

Last Name: LeBlanc

Mailing Address: 3205 Hwy 308

City: Napoleonville

Country: United States

State or Province: LA

ZIP/Postal Code: 70390

Email Address:

Organization Name:

Comment: The federal government should not be in the business of regulating what private citizens can do with devices they own. Its as simple as that. The FCC attempting to lock down devices to only run "approved" software, is limiting what people can do with those devices. I think it is truly a bad idea.

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Publish Date: 8/6/2015 12:00:00 AM

Submitter Info:

First Name: Jonathan

Last Name: Lane

Mailing Address: 6104 North Paulina Street, Apartment 3

City: Chicago

Country: United States

State or Province: IL

ZIP/Postal Code: 60660

Email Address: jon@dorsal.tk

Organization Name:

Comment: Requiring lock-down and conformance labeling for SDR devices effectively ruins their usefulness as SDR devices. The whole point of SDR is that they can be arbitrarily reconfigured at run time. A much better solution is to continue in the manner the FCC already does for HAM Radio - let devices do what they may, and if someone uses a device improperly blame them, not the device.

Requiring lock-down for devices with 802.11\* wifi radios is, if anything, even less sensible. Such a rule would make it impossible to install an alternate operating system on any computer or mobile device containing such a chip, and completely ignores the fact that such chips can be installed at any time with expansion cards or USB peripherals. If lock-down for wifi devices is required, it should be at the hardware or firmware level on the chip itself, without needlessly impinging on the rights of independent driver authors, hobbyist operating system programmers, or anyone who wants to change the software running on their computer or mobile device. One important system that would be irreparably damaged by this rule would be the Linux operating system. If it cannot be used with wifi on commercial off the shelf computers, that makes it significantly harder for developers to continue improving it, which in turn puts several of the US Navy's weapons systems at long-term risk by orphaning the operating system used, including the Zumwalt class of ships and certain types of naval drones. Therefore this rule is an unacceptable risk to national security.

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Publish Date: 8/6/2015 12:00:00 AM

Submitter Info:

First Name: Aditya

Last Name: Cowsik

Mailing Address: 304 Edgewood Dr.

City: Clayton

Country: United States

State or Province: MO

ZIP/Postal Code: 63105

Email Address: aditya.cowsik@gmail.com

Organization Name:

Comment: I'm concerned with the effect this change would make on the electronics industry. They would essentially make it much more difficult for open and continuing advancement. This government action would harm the whole country for no real benefit.

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RIN:

Publish Date: 8/6/2015 12:00:00 AM

Submitter Info:

First Name: John

Last Name: Salguero

Mailing Address: 8501 Willows Rd NE

City: Redmond

Country: United States

State or Province: WA

ZIP/Postal Code: 98052

Email Address: Accusedbold@hotmail.com

Organization Name:

Comment: It has come to my attention that the FCC has proposed, Equipment Authorization and Electronic Labeling for Wireless Devices, that will supposedly "lock down a device" such as a computer or mobile phone from users modifying it in novel and perhaps constructive ways such as fixing a security hole and even prevent them from installing certain OSs without the device functioning fully. This vexes me. I appreciate what the Federal Communications Commission has done for us and the numerous ways it elucidates telecommunications, but I really feel preventing people from modifying their own devices is overstepping some bounds. That is all I wish to say and I hope my voice is heard. If someone took the time to actually read this, then I thank you.

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Publish Date: 8/6/2015 12:00:00 AM

Submitter Info:

First Name: Michael

Last Name: Maul

Mailing Address: 1102 Park Ave

City: Garner

Country: United States

State or Province: NC

ZIP/Postal Code: 27529

Email Address: mike.maul@gmail.com

Organization Name:

Comment: Please do not implement rules that take away the ability of users to install the software of their choosing on their computing devices. In particular the justification for this rule is not valid. In particular there are no cases that I know of where consumer wireless devices causes disruption to the spectrum. More importantly this rule would be practically unenforceable and would waste resources of both manufactures, the FCC and inhibit innovation and commerce.

In particular:

Wireless networking research depends on the ability of researchers to investigate and modify their devices.

Americans need the ability to fix security holes in their devices when the manufacturer chooses to not do so.

Users have in the past fixed serious bugs in their wifi drivers, which would be banned under the NPRM.

Billions of dollars of commerce, such as secure wifi vendors, retail hotspot vendors, depends on the ability of users and companies to install the software of their choosing.

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RIN:

Publish Date: 8/6/2015 12:00:00 AM

Submitter Info:

First Name: jake

Last Name: mercadante

Mailing Address: 6403 e don julio st

City: long beach

Country: United States

State or Province: CA

ZIP/Postal Code: 90815

Email Address:

Organization Name:

Comment: I would like to comment against this proposition on the grounds that:

A) This could feasibly put a stop to much development taking place on new wireless technology. Researchers depend on the ability to modify their devices with their own custom software in order to create new ideas and new inventions. These inventions end up in the hands of rescue workers in need of short range ad-hoc wifi, people living in the middle of country / on islands use this tech to increase their connectivity. This is crucial in order for every part of the country to be connected.

B) In many cases, third party programs and operating systems help users patch holes in their devices security or generally improve the overall security of the device. We need to be able to take the protection of our information (such as finances, family situations, etc...) into our own hands when the manufacturer of the device is unresponsive (this is fairly common).

C) This would have a massive impact on the billions of dollars that flow through companies that rely on being able to modify and test their new ideas. This in turn would have a major negative impact on the well being of technological commerce in the US as a whole.

Thank you for reading

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RIN:

Publish Date: 8/6/2015 12:00:00 AM

Submitter Info:

First Name: Jacob

Last Name: McManus

Mailing Address: 73 Morningside

City: Torrington

Country: United States

State or Province: CT

ZIP/Postal Code: 06790

Email Address: jacobmcmanus303@gmail.com

Organization Name:

Comment: I hope that you consider the importance of the consumer and end-user's control over devices they purchase. This policy could stifle new research into wireless networking, and disallow consumers to fix problems their wireless device's manufacturers had left in, especially involving security.