

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

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| In the Matter of |) | |
| |) | |
| Amendment of Parts 0, 1, 2, 15 and 18 of the Commission's Rules regarding Authorization of Radiofrequency Equipment |) | ET Docket No. 15-170 |
| |) | |
| Request for the Allowance of Optional Electronic Labeling for Wireless Devices |) | RM-11673 |
| |) | |

COMMENTS OF CTIA – THE WIRELESS ASSOCIATION®

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I. INTRODUCTION AND SUMMARY.

CTIA – The Wireless Association® (“CTIA”) respectfully submits these comments in response to the Commission’s Notice of Proposed Rulemaking seeking comment on a number of proposals to update the rules that govern the evaluation and approval of radiofrequency (“RF”) devices.¹ CTIA applauds the Commission for setting forth proposals that are timely and generally reflect the way modern telecommunications equipment is designed, manufactured, and marketed. The changes that the Commission proposes in the *NPRM* will result in substantially increased efficiencies, reduced costs, and faster introduction of equipment to market, while still ensuring that RF devices operating in the United States do not cause harmful interference.

CTIA agrees with the Commission that streamlining the equipment authorization process to improve efficiencies will be critical to the advancement of new and exciting technologies,

¹ *Amendment of Parts 0, 1, 2, 15 and 18 of the Commission’s Rules regarding Authorization of Radiofrequency Equipment; Request for the Allowance of Optional Electronic Labeling for Wireless Devices*, Notice of Proposed Rulemaking, 30 FCC Rcd 7725 (2015) (“*NPRM*”); *see also Amendment of Parts 0, 1, 2, 15 and 18 of the Commission’s Rules regarding Authorization of Radiofrequency Equipment; Request for the Allowance of Optional Electronic Labeling for Wireless Devices*, Order, ET Docket No. 15-170, RM-11673, DA 15-956 (rel. Aug. 25, 2015) (extending deadlines for filing comments and reply comments).

including the Internet of Things (“IoT”) and 5G services.² To help the Commission achieve its goal of maintaining a rigorous yet efficient equipment authorization process, CTIA believes that the Commission should:

- Enhance its confidentiality protections by: (1) granting short-term confidentiality requests for a default period of 180 days; (2) subjecting all application exhibits to short-term confidentiality protections by default; and (3) automatically granting long-term confidentiality protections to exhibits that are currently eligible for such treatment;
- Issue certification grants in two stages – an initial grant and a final grant – to balance the need for protections before a device is launched with the needs of parties potentially aggrieved by a grant to have access to information necessary to timely challenge such grant;
- Encourage an efficient electronic labeling process by clarifying some of its proposals and requirements; and
- Adopt importation rules that preserve flexibility for manufacturers as they market products, including by reducing administrative burdens, increasing the number of devices that can be imported for demonstration purposes, and retaining the option of using Customs-bonded warehouses.

By taking the steps CTIA outlines in these comments, the Commission will help ensure that its equipment authorization process remains robust and up-to-date while accelerating the deployment of innovative equipment and technologies to consumers.

II. CTIA SUPPORTS COMMISSION EFFORTS TO IMPROVE AND STREAMLINE THE EQUIPMENT AUTHORIZATION PROCESS.

CTIA commends the Commission for recognizing the need to update and streamline its equipment authorization procedures. As the Commission notes, since the procedures were last updated in 1998, there has been explosive growth in the number of RF devices routinely submitted for FCC approval.³ This sky-rocketing demand for devices and products subject to

² See *NPRM* ¶ 23.

³ See *NPRM* ¶ 14 (noting that “the number of types of RF devices subject to our equipment authorization requirements increases substantially every year as existing product lines are expanded and new types of devices and services are introduced to the market”).

Commission equipment authorization requirements promises to persist as the IoT ecosystem continues to advance, enabling machine-to-machine (“M2M”) technology and further facilitating the connected life for consumers and enterprises. As noted in the *NPRM*,⁴ analysts predict that up to 50 billion devices and objects could be connected to the Internet by 2020⁵ and, as a result, “wireless functionality will become part of nearly everything we do,” revolutionizing the way we live and work.⁶ Faced with the associated avalanche of new connected devices, the Commission is correct that streamlining and improving the equipment authorization process will be critical to ensuring that the agency “keep[s] pace with the accelerating introduction of an ever-expanding breadth of devices and products into the marketplace.”⁷

The *NPRM* strikes an appropriate balance between the important goals of streamlining the equipment authorization process, reducing administrative burdens, and ensuring that RF devices do not cause harmful interference and otherwise comply with the Commission’s rules. Importantly, the proposals in the *NPRM* generally reflect modern manufacturing and marketing practices. For example, the *NPRM* proposes to allow a “family of products” to be certified under a single FCC identifier.⁸ Under this approach, the Commission would recognize a group of devices that are “essentially similar, based upon the overall design of the devices, their functions, components and layout” as “variations of a single device.”⁹ Manufacturers could thus obtain a

⁴ *NPRM* ¶ 118, n.218.

⁵ See Cisco, Internet of Things (IoT), <http://www.cisco.com/web/solutions/trends/iot/portfolio.html> (last visited Sept. 21, 2015).

⁶ Statement of Commissioner Jessica Rosenworcel, Federal Communications Commission, Before the United States Senate Committee on Commerce, Science & Transportation, *Wireless Broadband and the Future of Spectrum Policy*, at 1 (July 29, 2015), available at http://transition.fcc.gov/Daily_Releases/Daily_Business/2015/db0729/DOC-334645A1.pdf.

⁷ *NPRM* ¶ 1.

⁸ *Id.* ¶ 55.

⁹ *Id.*

single approval and FCC ID for a suite of products.¹⁰ CTIA strongly supports this proposal, as it would increase the efficiency of bringing new products into the marketplace. Under the current equipment authorization framework, manufacturers must seek separate certifications for different carrier versions of the same device. The Commission’s proposed approach would eliminate this unnecessary regulatory burden and expedite the approval process, a result that will ultimately inure to consumers’ benefit as access to new equipment opens “a speedier path to the possibilities of the Internet of Things.”¹¹

While CTIA appreciates and generally supports the proposals made in the *NPRM*, the improvements suggested herein are designed to advance the Commission’s goals of reducing unnecessary administrative burdens while promoting a device ecosystem that is free from harmful interference. By taking the steps outlined below, the Commission will help ensure that its regulatory framework facilitates efficient authorization of the myriad devices manufacturers hope to bring to market to realize the potential of the IoT and future network evolutions such as 5G.

III. CTIA GENERALLY SUPPORTS THE COMMISSION’S PROPOSED CHANGES TO ITS CONFIDENTIALITY RULES.

In the *NPRM*, the Commission proposes a number of ways to simplify and clarify the agency’s certification procedures as they apply to parties responsible for submitting certification applications.¹² Among other things, the Commission seeks comment on proposed modifications to the confidentiality provisions for certification applications. Currently, Telecommunication Certification Bodies (“TCBs”) upload certification application information to the FCC’s

¹⁰ *Id.*

¹¹ *Id.* at Statement of Commissioner Jessica Rosenworcel.

¹² *See NPRM* ¶ 33.

Equipment Authorization System.¹³ While application materials generally are made available on the Commission’s website after an equipment certification is granted, some information is required to be (or may be requested to be) held confidential.¹⁴ Confidentiality can come in two forms: short-term confidentiality, which allows for the preparation for marketing of devices without disclosure of sensitive information prior to sale (*e.g.*, photos, user manuals), and long-term confidentiality, which is intended to safeguard trade secrets that are not readily discoverable upon the release of the device.¹⁵ The Commission proposes in the *NPRM* to modify the procedures relating to both forms of confidentiality, proposals which – as described below – CTIA generally supports.

A. The Commission Should Modify Its Short-Term Confidentiality Procedures.

CTIA agrees that the Commission should codify the short-term confidentiality procedures described in the Commission’s 2004 Public Notice concerning such requests, with a few suggested improvements.¹⁶ Under the Commission’s proposal, short-term confidentiality would be granted for a period of 45 days from the date of the grant of equipment authorization.¹⁷ Applicants could then extend this initial short-term confidentiality grant for a maximum of 180 days “with serial requests.”¹⁸ CTIA agrees that 180 days represents an appropriate maximum amount of time for information to receive short-term confidentiality treatment. However, rather than requiring applicants to submit “serial requests” to extend the initial 45-day period, the initial period of short-term confidentiality protection should last for 180 days by default. Put simply,

¹³ *Id.* ¶ 80.

¹⁴ *Id.*

¹⁵ *Id.* ¶¶ 81, 87.

¹⁶ *Id.* ¶¶ 81, 84; *see also OET Equipment Authorization System Upgrade Permits Electronic Submittal of Short-Term Confidentiality Requests*, Public Notice, 19 FCC Rcd 10647 (OET 2004).

¹⁷ *NPRM* ¶ 84.

¹⁸ *Id.*

manufacturers should not be required to renew their short-term confidentiality requests in 45 day increments.

Granting short-term confidentiality upon an applicant's request for a default period of 180 days is consistent with the Commission's current practice and promotes administrative efficiency. Under the Commission's current approach to short-term confidentiality protection, manufacturers typically seek and are granted short-term confidentiality protection for 180 days in their initial request letters. The rules that the Commission adopts should comport with this practice. A standardized 180-day period for short-term confidentiality would also reduce administrative burdens for both the Commission and applicants. Moreover, applicants would still be under an obligation to inform the Commission or the TCB (whoever issued the grant of certification) if the device is marketed to the public or otherwise publicized prior to the conclusion of the 180-day period so that the subject exhibits can be made publically available immediately.¹⁹

The *NPRM* also inquires about the benefits of considering all equipment authorization application exhibits as part of a short-term confidentiality request, rather than requiring applicants to specifically identify application exhibits for which short-term confidentiality is sought.²⁰ CTIA submits that all application exhibits, by default, should be granted short-term confidentiality protection. Such a framework would extend important confidentiality treatment to sensitive business information at a critical time: a product's introduction to the market. As the Commission has recognized, launching a new device or product "has increasingly become a significant public event," with a premium placed on keeping design information confidential "to

¹⁹ See *id.* ¶ 82.

²⁰ *Id.* ¶ 85.

ensure competitive advantage[s]” are not lost.²¹ With these important business consequences at stake, the Commission should ensure that its regulatory approach adequately protects sensitive device information. The Commission can best achieve this goal by treating all application exhibits as part of a short-term confidentiality request and allowing applicants to decline to pursue short-term confidentiality protection for some or all of its application exhibits, should the applicant so choose. CTIA’s proposed approach would protect against the inadvertent disclosure of sensitive information due to an administrative oversight if, for example, an applicant mistakenly fails to request short-term confidentiality or a TCB accidentally omits a particular exhibit from a short-term confidentiality grant.

Finally, CTIA believes that test reports and test set-up information should be eligible for short-term confidentiality treatment. In some cases, test reports and test set-up information can be leveraged to glean information about devices. This is particularly problematic during the critical period when manufacturers are carefully guarding information before a marketing launch. According short-term confidentiality treatment to these tests would prevent sensitive information from being made public before the receipt of additional approvals, such as operator-specific approval processes and approval by individual carriers.

B. The Commission Should Modify Its Long-Term Confidentiality Procedures.

CTIA agrees that the Commission should automatically grant long-term confidentiality for exhibits for which long-term confidentiality is now available through separate filings: schematics, block diagrams, operational descriptions, and parts list/tune-up information.²² As the Commission correctly notes, virtually every equipment authorization application is

²¹ *Id.* ¶ 81.

²² *Id.* ¶ 88.

accompanied by a request for long-term confidentiality for these types of exhibits.²³ Because such requests are routinely granted, requiring a separate filing to secure long-term confidentiality is a resource drain that should be eliminated. Consistent with the Commission’s overarching goals, eliminating the additional steps needed to receive long-term confidentiality treatment for these types of exhibits will reduce administrative burdens and help ensure that new and innovative devices are “brought to the market expeditiously.”²⁴

IV. THE COMMISSION SHOULD ADOPT A TIMEFRAME FOR REQUESTING REVIEW OF CERTIFICATION GRANTS THAT IS CONSISTENT WITH SHORT-TERM CONFIDENTIALITY PROTECTIONS.

The *NPRM* proposes to specify that the “release date” for the grant of a certification is the date the grant is published on the FCC website, which would begin the 30-day period for parties to contest a grant.²⁵ The *NPRM* then notes that the FCC’s proposals on confidentiality could affect the ability of parties to contest a certification grant, as relevant information needed for the challenge may be unavailable because it has been granted short-term confidentiality protection.²⁶ This is because, as a practical matter, under the FCC’s current procedures, grants are published on the Commission website upon approval, but exhibits that may be necessary for grant challenges are given short-term confidentiality protections for a period beyond the 30-day challenge window. The unavailability of exhibits subject to short-term confidentiality could thus disadvantage parties that may wish to challenge a certification grant.²⁷

To remedy this potential dilemma, CTIA agrees with the Commission’s proposal to issue grants in two stages. First, an “initial” grant should trigger the short-term confidentiality

²³ *Id.*

²⁴ *Id.* ¶ 15.

²⁵ *Id.* ¶ 90.

²⁶ *Id.* ¶ 91.

²⁷ *Id.*

protections and allow for pre-sale importation and other activities to prepare a device for market launch. Second, a “final” grant should be released on the date that the device is sold to the public or otherwise made public, which would constitute the public notice that begins the 30-day period during which parties aggrieved by the grant may file a petition for reconsideration or application for review.²⁸ As the Commission notes, this “final” grant date “represents the most relevant date to begin the thirty-day [contest] period.”²⁹ Moreover, CTIA believes that this two-step process would balance the needs of providing grantees necessary protections to plan and control the market launch of devices while still allowing any party aggrieved by a grant to have access to sufficient information to challenge it in a timely manner.

V. THE COMMISSION SHOULD ENCOURAGE AN EFFICIENT ELECTRONIC LABELING FRAMEWORK.

CTIA supports the Commission’s proposal to add a new section to the Commission’s rules to codify current electronic labeling practices³⁰ to allow manufacturers to display required labeling and regulatory information electronically in place of affixing physical labels to devices.³¹ As interested stakeholders have noted, electronic labels are “more effective in providing information to consumers who are used to receiving information electronically.”³² Aside from being consumer friendly, electronic labels also can provide numerous benefits for

²⁸ See *id.* ¶ 92 (proposing that the “final certification grant” constitute the public notice date).

²⁹ *Id.*

³⁰ See *id.* ¶ 95 (discussing KDB Publication 784748, which “allows for the electronic display of the FCC ID, the FCC logo currently required under the [Declaration of Conformity] procedures, and/or any other information that is required by our equipment authorization rules to be provided on the surface of the product”).

³¹ *NPRM* ¶ 97.

³² *Id.* ¶ 96 (citing Telecommunication Industry Association, Petition for Rulemaking, RM-11673 (filed Aug. 6, 2012) (“TIA Petition”)); see also, e.g., Commissioner Michael O’Rielly, *E-Labeling Deserves Serious Consideration*, FCC BLOG (Apr. 25, 2014), <https://www.fcc.gov/blog/e-labeling-deserves-serious-consideration> (discussing the “numerous potential benefits to e-labeling”).

manufacturers, including reduced costs, greater logistical flexibility, and increased freedom in the design and aesthetics of devices.

While CTIA generally supports the Commission's proposals codifying its existing electronic labeling practices, CTIA believes the Commission should clarify and modify some of its proposals to increase efficiency while ensuring consumers and regulators have reasonable access to required regulatory information. First, the Commission should clarify that, in addition to the information that currently must be placed on a physical label,³³ e-labeling may be used to convey any regulatory information or warnings that the Commission requires manufacturers to provide either on the device or in the user manual (excluding, of course, the user instructions on how to access the e-labels on the device). An example of such information would be information regarding the Hearing Aid Compatibility ("HAC") rating of a mobile phone. In addition, the Commission should permit manufacturers to provide links on a device's menu to more detailed explanatory information about these and other ratings.

Second, the *NPRM* proposes requiring that the user be provided with prominent instructions on how to access the required labeling and regulatory information, in either the packaging material or another easily accessible format, at the time of purchase, *and* that these instructions be available on the product-related website, if one exists.³⁴ CTIA agrees that manufacturers should be permitted to provide instructions on how to access the required labeling and regulatory information on the product website. KDB Publication 784748 currently provides this flexibility and the Commission should preserve it. Moreover, such an option would allow manufacturers to reduce the size and weight of packaging materials, and consumers may even be

³³ This information includes, for example, the FCC Identifier and any other statements or labeling requirements imposed by the rules governing the operation of the specific class of equipment.

³⁴ *NPRM* ¶ 98.

more likely to access this information on a product website.³⁵ However, manufacturers should be permitted to provide instructions on how to access the required labeling and regulatory information on the product website as an *alternative* to providing it in the packaging material; they should not be required to provide *both*, as the *NPRM* proposes. In other words, the Commission should allow manufacturers to provide these instructions on a product-related website, but should not require them to do so if they do not maintain a website or if they elect to include the information in the packaging material or other accessible format. Requiring instructions through both means is excessive and unnecessary, and it contradicts the Commission’s streamlining goals in this proceeding. Instead, requiring *either* should be sufficient. Additionally, the FCC should clarify that inclusion of these instructions in the device’s user manual satisfies this requirement, as such an approach is consistent with the guidance currently set forth in KDB Publication 784748. With these clarifications, manufacturers will have needed certainty about how to meet the Commission’s instruction requirements.

Finally, to provide information prior to purchase, to avoid hazards, or during device importation, the *NPRM* proposes to require that devices employing electronic labeling also display the required information “on the product packaging or on a physical label placed on the product at the time of importation, marketing, and sales” and that a removable label may be used to provide this information.³⁶ CTIA is concerned that the *NPRM* could be read to imply that the removable label must contain more information than would typically be required under Section

³⁵ Indeed, as TIA has noted, consumers may more often “look to the Internet for instructions on how to operate their devices before reading user manuals.” TIA Petition at 12.

³⁶ *NPRM* ¶ 99.

2.925 of the Commission's rules.³⁷ For example, the *NPRM* references HAC information and information regarding harmful interference in its discussion of the temporary label requirement.³⁸ The Commission should clarify that *only* the FCC Identifier and information that is otherwise required to be shown on a physical label attached to the device under Section 2.925 would be required to appear on the temporary label. HAC information and other disclosures should not be required on the temporary label if they are not required on the permanently affixed label required by Section 2.925. In other words, the temporary label requirement should not impose more onerous labeling requirements on manufacturers than the obligations set forth in Section 2.925 of the Commission's rules.

VI. CTIA GENERALLY SUPPORTS THE PROPOSED CHANGES TO IMPORTATION RULES.

CTIA supports several changes proposed in the *NPRM* related to the importation of RF equipment, as these proposals will reduce costs and administrative burdens for manufacturers and reflect the ways that devices are currently exported into the United States. First, CTIA agrees with the proposal to eliminate the requirement to file Form 740 and to eliminate the explicit importation declaration requirement from the Commission's rules.³⁹ As the Commission recognizes, these requirements are no longer necessary due to information that is already collected by Customs and Border Protection ("CBP"), and their elimination will reduce administrative burdens for importers.

Second, the *NPRM* proposes to increase the number of devices that can be imported for demonstration purposes at trade shows prior to equipment authorization from 200 to 400 for

³⁷ *See id.* ("The content of these labels is an important means for providing consumers with information about RF devices."); *see also id.*, n.181 ("[T]hese labels may inform consumers that the device is compatible with hearing aids or is required to not cause harmful interference to other devices.").

³⁸ *See id.*

³⁹ *Id.* ¶ 120.

devices used in licensed services and from 10 to 400 for other products.⁴⁰ CTIA supports this proposal, as it will reduce the administrative burdens on manufacturers by eliminating the need to seek waivers of the rule in most cases. At the same time, the increase will not impact the Commission’s ability to ensure that such devices do not cause harmful interference.

CTIA also supports applying a single limit for all types of imported devices and agrees with the Commission that the current limit is “insufficient to accommodate the needs of modern trade shows and conventions.”⁴¹ CTIA notes, however, that there seems to be a discrepancy between the text of the *NPRM*, which states that the new rule will be a single limit for “all types of devices,”⁴² and the proposed modification to Section 2.1204(a)(4)(i) in Appendix A, which only references this new limit for products for which a license is required (*i.e.*, “designed solely for operation within one of the Commission’s authorized radio services for which an operating license is required to be issued by the Commission.”).⁴³ The proposed rule should be revised so that it covers all types of devices, consistent with the proposal in the *NPRM*’s text.

Finally, the *NPRM* seeks comment on whether the proposal to issue provisional grants of certification would reduce or eliminate the need for using Customs-bonded warehouses and proposes eliminating the explicit bonded warehouse requirement in Section 2.1201(c) of the Commission’s rules.⁴⁴ CTIA notes that the Commission’s proposal to issue “provisional” grants allowing legal importation and distribution through the supply chain of devices prior to sale may

⁴⁰ *Id.* ¶ 123.

⁴¹ *Id.*

⁴² *Id.*

⁴³ *Id.* at Appendix A at 70.

⁴⁴ *Id.* ¶ 122. A Customs-bonded warehouse” is “a building or other secured area in which imported dutiable merchandise may be stored, manipulated, or undergo manufacturing operations without payment of duty for up to 5 years from the date of importation.” *See U.S. Customs and Border Protection Bonded Warehouse*, CBP, U.S. DEPARTMENT OF HOMELAND SECURITY (Feb. 2010), https://www.cbp.gov/sites/default/files/documents/bonded_20wh2_2.pdf.

reduce the need for using bonded warehouses. Nevertheless, the option of using bonded warehouses should be retained. There could be circumstances where an importer may still want to take advantage of the option to use a bonded warehouse to provide flexibility in its importation and distribution processes. For this reason, CTIA urges the Commission to maintain the bonded warehouse option and preserve Section 2.1201(c) in the Commission's rules.

VII. CONCLUSION.

CTIA commends the Commission for its timely proposals to update and streamline its equipment authorization procedures. These proposals are critical as the wireless industry and the FCC face a near-term explosion in the number of connected devices that will need Commission approval to facilitate the continued growth of the IoT and the next generation of mobile networks, such as 5G. While the proposals made in the *NPRM* represent a step forward in facilitating the timely introduction of devices to fuel this growth, CTIA believes that adopting the proposals as modified herein will better ensure an efficient and effective equipment authorization process.

Respectfully submitted,

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