

Submitter Info.txt

Please Do Not Reply To This Email.

Public Comments on Equipment Authorizations:=====

Title: Equipment Authorizations
FR Document Number: 2015-21634
RIN:
Publish Date: 9/1/2015 12:00:00 AM

Submitter Info:

First Name: Karen
Last Name: Smith
Mailing Address: 3055 Vista View Blvd
City: Columbus
Country: United States
State or Province: OH
ZIP/Postal Code: 43231
Email Address: psykechan@hotmail.com
Organization Name:

Comment: As a network administrator who is used to working with small to medium size businesses where off-the-shelf commodity hardware is commonly used, as well as assisting individuals with their home networks, I have installed and configured aftermarket router firmware many times, either to add features that were needed (such as IPS or VPN from a home or branch to the main office) or for fixing vulnerabilities that the manufacturer either did not deem worthwhile to fix or because the product's support had been discontinued despite still being currently sold.

With the proposed changes to the SDR rules, end users would be at the mercy of manufacturers to add features and fix vulnerabilities; things that they are currently failing to do under the existing rules.

Claiming that the draconian step of forcing manufacturers to lock out aftermarket firmware to ensure that devices adhere to RF regulations is preposterous. It would be easier, and dare I say cheaper, to force manufacturers to hardware limit the operating specifications of the SDR to remain in compliance. Doing so would force manufacturers to have different devices for different regions.

Even without a more lenient requirement, it is still not even necessary as the commission could work (either directly or indirectly with regulations) with the major aftermarket firmware organizations (OpenWRT, DD-WRT, and Tomato) and create USA specific distributions that would cause the devices to remain in compliance.

Regardless, even if the proposed changes are approved, willful violators of the 5 GHz Unlicensed Spectrum (<https://www.fcc.gov/document/5-ghz-unlicensed-spectrum-unii>) that are causing the problems, could simply use older equipment until vulnerabilities in the proposed SDRs are found that enable them to use the newer devices. Enforcement of fines and seizures is the only course of action here and this could be done without the rule changes.

The proposed regulations will not fix any problems but they will cause sufficiently more. Unchecked vulnerabilities will be exploited for potential DDOS attacks as control of devices is taken from the end users and given to cyberterrorists. The only recourse for the owners of these compromised devices is to dispose of it and purchase a new one, therefore creating needless e-waste.

I urge the commission to reject the proposed rule.

As a network administrator who is used to working with small to medium size businesses where off-the-shelf commodity hardware is commonly used, as well as assisting individuals with their home networks, I have installed and configured aftermarket router firmware many times, either to add features that were needed

Submitter Info.txt

(such as IPS or VPN from a home or branch to the main office) or for fixing vulnerabilities that the manufacturer either did not deem worthwhile to fix or because the product's support had been discontinued despite still being currently sold.

With the proposed changes to the SDR rules, end users would be at the mercy of manufacturers to add features and fix vulnerabilities; things that they are currently failing to do under the existing rules.

Claiming that the draconian step of forcing manufacturers to lock out aftermarket firmware to ensure that devices adhere to RF regulations is preposterous. It would be easier, and dare I say cheaper, to force manufacturers to hardware limit the operating specifications of the SDR to remain in compliance. Doing so would force manufacturers to have different devices for different regions.

Even without a more lenient requirement, it is still not even necessary as the commission could work (either directly or indirectly with regulations) with the major aftermarket firmware organizations (OpenWRT, DD-WRT, and Tomato) and create USA specific distributions that would cause the devices to remain in compliance.

Regardless, even if the proposed changes are approved, willful violators of the 5 GHz Unlicensed Spectrum (<https://www.fcc.gov/document/5-ghz-unlicensed-spectrum-unii>) that are causing the problems, could simply use older equipment until vulnerabilities in the proposed SDRs are found that enable them to use the newer devices. Enforcement of fines and seizures is the only course of action here and this could be done without the rule changes.

The proposed regulations will not fix any problems but they will cause sufficiently more. Unchecked vulnerabilities will be exploited for potential DDOS attacks as control of devices is taken from the end users and given to cyberterrorists. The only recourse for the owners of these compromised devices is to dispose of it and purchase a new one, therefore creating needless e-waste.

I urge the commission to reject the proposed rule.

Karen Smith
3055 Vista View Blvd
Columbus OH 43231
psykechan@hotmail.com

As a network administrator who is used to working with small to medium size businesses where off-the-shelf commodity hardware is commonly used, as well as assisting individuals with their home networks, I have installed and configured aftermarket router firmware many times, either to add features that were needed (such as IPS or VPN from a home or branch to the main office) or for fixing vulnerabilities that the manufacturer either did not deem worthwhile to fix or because the product's support had been discontinued despite still being currently sold.

With the proposed changes to the SDR rules, end users would be at the mercy of manufacturers to add features and fix vulnerabilities; things that they are currently failing to do under the existing rules.

Claiming that the draconian step of forcing manufacturers to lock out aftermarket firmware to ensure that devices adhere to RF regulations is preposterous. It would be easier, and dare I say cheaper, to force manufacturers to hardware limit the operating specifications of the SDR to remain in compliance. Doing so would force manufacturers to have different devices for different regions.

Even without a more lenient requirement, it is still not even necessary as the commission could work (either directly or indirectly with regulations) with the major aftermarket firmware organizations (OpenWRT, DD-WRT, and Tomato) and create USA specific distributions that would cause the devices to remain in compliance.

Regardless, even if the proposed changes are approved, willful violators of the 5 GHz Unlicensed Spectrum (<https://www.fcc.gov/document/5-ghz-unlicensed-spectrum-unii>) that are causing the problems, could simply use older equipment until vulnerabilities in the proposed SDRs are found that enable them to use the newer devices. Enforcement of fines and seizures is the only course of action here and this could be done without the rule changes.

The proposed regulations will not fix any problems but they will cause sufficiently more. Unchecked vulnerabilities will be exploited for potential DDOS attacks as control of devices is taken from the end users and given to cyberterrorists. The only recourse for the owners of these compromised devices is to dispose of it and purchase a new one, therefore creating needless e-waste.

I urge the commission to reject the proposed rule.

Sincerely,

Karen Smith