

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

In the Matter of

Amendment of Parts 1, 2, 22, 24, 27, 90
and 95 of the Commission's Rules to
Improve Wireless Coverage Through the
Use of Signal Boosters

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WT Docket No. 10-4

COMMENTS

of

SPOT ON NETWORKS, LLC

To: Jon Wilkens, Bureau Chief
Wireless Telecommunications Bureau

AND NOW COMES SPOT ON NETWORKS, LLC, ("Spot On") by and through its attorney Frederick A. Polner, Esquire, and submits this its COMMENTS in the above captioned proceeding. In support wherefore it is averred as follows:

By PUBLIC NOTICE, released February 29, 2016, the Wireless Telecommunications Bureau, is requesting comments on the Commission's *Signal Booster Report and Order*, by which the Commission adopted new technical, operational, and registration requirements for consumer signal boosters. Spot On takes this opportunity to submit its comments in response to the Public Notice.

Spot On is an innovative designer, integrator and installer of turnkey signal booster systems in the multi-tenant residential building, commercial office building, and hospitality industries.

Many residents and tenants in multitenant buildings experience degraded wireless service including poor voice quality, slow data speeds or incomplete data transmissions using smartphones, tablets and computers. These wireless problems in multitenant buildings are caused by the new way in which many large buildings are being constructed. Building construction that follows the "LEED" model, (Leadership in Energy & Environmental Design) in multitenant buildings can lower operating

costs and increase asset value, conserve energy, water and other resources and help owners qualify for money-saving incentives, like tax rebates and zoning allowances. However, this new construction technique can prevent the penetration of radio frequency signals, especially wireless signals, into these buildings.

The introduction of 4G/LTE services by the country's wireless carriers further complicates the issue, since these services tend to use upper frequency bands and small cells in densely occupied areas like large cities where multiple high rise buildings often are found. Higher frequency bands in smaller cells further reduce the ability to provide cellular signal inside a building.

As the Commission knows all too well, there are abundant studies which project increasing data usage and increasing smartphone usage. This significant increase of data traffic will come from such applications as video streaming, among others, that primarily will be done in the home. The Commission's *Signal Booster Report and Order* significantly ameliorates this problem by providing a path forward for the deployment of signal boosters without disrupting wireless networks.

Poor indoor wireless signal also can impede emergency calls to 911 first responders and has a negative impact on the selling and leasing of commercial buildings. Spot On has found signal boosters to be a cost effective way to mitigate these problems and to provide robust wireless coverage to the inhabitants of these buildings.

The FCC rightfully has concluded that allowing use of signal boosters serves the public interest. Cognizant, however, that malfunctioning, improperly installed, or technically deficient signal boosters can cause harmful interference to wireless networks, in February 2013, the Commission adopted a comprehensive set of rules to address these concerns and ensure the continuing viability of wireless service.

The Commission adopted a new regulatory framework to allow consumers to realize the benefits of using signal boosters while preventing, controlling, and, if necessary, resolving interference to wireless networks. This new framework entailed adopting new technical, operational, and registration requirements for signal boosters. The new rules created two classes of signal boosters – Consumer and Industrial – with distinct regulatory requirements for each.

For Consumer Signal Boosters, the Commission adopted a new Network Protection Standard (the "NPS"). This new NPS lays out a set of requirements for the design and manufacture of Consumer Signal Boosters. Spot On applauds these new requirements as Spot On's actual experience with the NPS requirements confirms the Commission's view that the NPS strikes the right balance between signal booster innovation and adequate safeguards to protect wireless networks from harmful interference.

As the Chief observed in the Public Notice, consumers now have access to a wide range of consumer signal boosters that satisfy the technical protections found in the new FCC rules. Notably, the four nationwide wireless carriers had consented to the use of *all*

of the consumer boosters that the FCC had certified by March 2015, and as of February of this year even more consumer boosters have been certified. Further, the proof is in the eating of the pudding, as each of the nationwide wireless providers has established and implemented the necessary consumer registration procedures, which to Spot On's point of view, is telling evidence that the signal booster framework is working for both consumers and the wireless networks. Exemplary of the fact that the FCC has achieved the correct balance between the robust deployment of signal boosters and protection of wireless networks from harmful interference is the view of Sprint Corporation made to the Commission in its March 8, 2016 filing in the captioned proceeding. In that filing, Sprint says:

Sprint remains supportive of the Commission's initiative to bring well-designed signal boosters to market. Properly designed and installed signal boosters can aid wireless users by expanding the usability of wireless networks in areas of poor signal coverage, while improperly designed signal boosters can cause significant harmful interference to the users and operators of commercial wireless networks.

And, it goes on to say:

Sprint has found that Consumer Signal Boosters certified by OET as meeting the required Network Protection Standards are currently causing no significant negative impact on our Network operations.

CONCLUSION

The FCC has struck the correct balance between the robust deployment of signal boosters and the protection of wireless networks from harmful interference. No changes to the existing framework should be made.

Respectfully submitted,

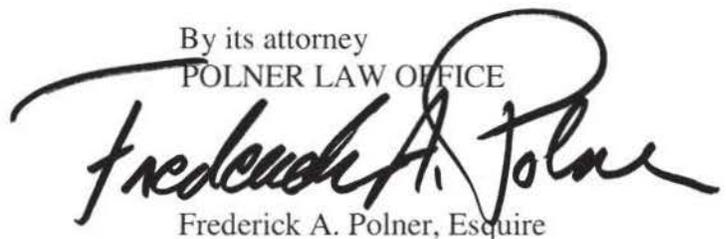
SPOT ON NETWORKS, LLC

Dated: March 29, 2016

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By its attorney
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