

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of)	
)	
Amendment of Parts 1, 2, 22, 24, 27, 90 and 95)	WT Docket No. 10-4
of the Commission’s Rules to Improve Wireless)	
Coverage Through the Use of Signal Boosters)	
)	
Wireless Telecommunications Bureau Seeks)	DA 16-21 <input type="checkbox"/>
Comment on the Current State of Consumer)	
Signal Boosters <input type="checkbox"/> <input type="checkbox"/>)	

**REPLY COMMENTS OF
SURECALL**

SureCall¹ provides these reply comments in response to the Bureau’s Public Notice requesting comment on the state of the consumer cell phone booster industry two years after the adoption of the Signal Boosters Order.² SureCall concurs with the other comments in the record confirming that the consumer signal booster rules “have worked as intended”³ and “appear[] to be a success.”⁴

Undeniably, the adoption of the consumer signal booster rules required substantial effort by the signal booster industry to rapidly redesign its offerings to comply with the new requirements. SureCall takes this opportunity to commend the extraordinary effort by the staff

¹ SureCall previously participated in this proceeding under its prior name, Cellphone-Mate Inc.

² Wireless Telecommunications Bureau Seeks Comment on the Current State of Consumer Signal Boosters, WT Docket No. 10-4, DA 16-221 (Feb. 29, 2016) (“*Notice*”); 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, Report and Order, WT Docket No. 10-4, FCC 13-21 (2013) (“*Order*”).

³ Comments of Verizon, WT Docket No. 10-4 at 1 (Mar. 30, 2016).

⁴ Comments of T-Mobile USA, Inc., WT Docket No. 10-4 at 1 (March 30, 2016).

of the Office of Engineering and Technology to expeditiously process the large volume of equipment certification applications generated as a result of the new technical requirements for consumer signal boosters adopted in the Order. This effort, and the judicious extension of the March 1, 2014 deadline for compliance with the new rules,⁵ helped smooth the transition.

Although the changes were disruptive and costly to signal booster manufacturers, the industry today has survived, absorbed these losses, and continued growing. As the Bureau notes, today there are 76 approved consumer signal boosters available for sale from 13 different manufacturers, ensuring substantial options to meet customers' needs as well as foster competition and ongoing development.⁶

In addition to meeting the needs of consumers, the new rules appear to be achieving the Commission's goal of improving network access for individual devices without increasing the risk of interference to carrier networks. Verizon reports "over 10,000 registered consumer signal booster users" operating "without harming wireless carrier networks."⁷ Likewise, Sprint confirms that the newly certified consumer signal boosters "are currently causing no significant negative impact on [its] Network operations." This is consistent with SureCall's experience. SureCall has shipped thousands of consumer signal boosters that were certified under the new rules and our technical support team has received no reports from our customers or the wireless carriers of interference to a carrier network.

⁵ 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, WT Docket No. 10-4, DA 14-177 (Feb. 11, 2014).

⁶ Wireless Telecommunications Bureau Reminds Nationwide Wireless Service Providers of Obligation to Release Information Regarding Consumer Signal Boosters, Public Notice, WT Docket No. 10-4, DA 16-137 (WTB Feb. 28, 2016) ("2016 Public Notice").

⁷ *Verizon Comments* at 2.

For the above reasons, SureCall agrees that the Commission's efforts to update its signal booster rules have been a success. There is robust competition in the consumer signal booster market, and these devices are helping to extend the reach of mobile broadband services for consumers without resulting in harmful interference to carrier networks.

Respectfully submitted,

SURECALL

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