



GPD TELECOM, INC
Radio Frequency System Design. Installation. Repair.

February 3, 2010

GPD Telecom Inc.
520 South Main St.
Suite 2531
Akron, Ohio 44311

**Letter of Comment - WT Docket No. 1-04
Use of Signal Boosters and Other
Amplification Techniques Used with Wireless Services**

Ladies and Gentlemen,

This comment is rendered by GPD Telecom Inc. in response to the Public Notice issued on January 6, 2010 regarding the use of Signal Boosters and Other Amplification Techniques Used with Wireless Services. GPD Telecom Inc. is a Wireless Engineering firm that designs and installs wireless in building coverage solutions and special applications. GPD Telecom Inc. provides this comment as an interested party of the petitions put before the FCC by Bird Technologies, CTIA, Jack Daniel Company, DAS Forum and Wilson Electronics. GPD Telecom's comment will address specifically the licensing of Class A and Class B Signal Boosters, interference caused by Signal Booster use and the installation and operation of Signal Booster systems.

GPD Telecom Inc. is in agreement with Bird Technologies Inc. August 18, 2005 petition that signal boosters should only be used with the full knowledge of the license holder and that the private consumer or commercial entity should be required to obtain written permission from the license holder.

GPD Telecom Inc. agrees with the petitioners here because the use of BDA's or similar amplification system can and do cause destructive noise to the donor system when not properly aligned by a properly trained technician. Setting aside Licensee control would allow any individual with a desire to improve their coverage and a couple hundred dollars to negatively affect the performance of the radio network. This noise interference presents a raised noise floor subsequent reduction in coverage from the donor site, expenditures of time and money to investigate the increased noise and degradation in service to the customers / users of the system. Without Licensee control of the airwaves the Carriers are limited in the ability to serve their customer base.

GPD Telecom Inc. is in agreement with CTIA petition filed November 2, 2007 regarding the proper use of signal boosters in Commercial Mobile Radio Services (CMRS). GPD Telecom would further comment that interference from Class A and more specifically Class B signal Boosters is a concern from both an "in band" interference to the desired donor site as well as "out of band" interference to adjacent bands operated by other commercial or private entities. Any new rules developed by the FCC should consider an emphasis on improvement of signal booster filtering and adjacent band rejection techniques.

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GPD Telecom Inc. is in agreement with the petition filed September 25, 2008 by the Jack Daniel Company seeking clarification of the Commission's rules regarding signal boosters. GPD Telecom Inc. would advocate allowing state and local governments to require the use of wideband signal boosters to improve wireless coverage in appropriate public and private structures. Moreover, these state and local governments can rely on national standards like the International Fire Code (IFC), National Fire Protection Association (NFPA), National Electric Code (NEC) and state and local building code to regulate the proper installation of signal booster systems.

GPD Telecom Inc. is in complete disagreement with the petition filed October 23, 2009 by the DAS Forum's assertion for the needed to address the marketing, installation, and operation of signal boosters used in the Cellular Radiotelephone and Personal Communications Services. GPD Telecom is of the opinion the current requirement of FCC rulings governing the resolution of interference issues is adequate and should be retained as stated. GPD Telecom's opinion is that an industry "Code of Conduct" would be unenforceable and un-measurable and only open the door for broader reckless deployment of signal boosters by commercial and private individuals causing untold harm and loss of revenue to Cellular Radiotelephone and Personal Communications Service providers. GPD Telecom further extends this comment to the Public Safety Communication services where inappropriately installed and operating signal boosters could pose serious life threatening consequences. GPD would suggest that the BDA the manufacturers sell BDA's only to Manufacturer Trained System Integrators.

GPD Telecom Inc. is in complete disagreement with the petition filed November 3, 2009 by the Wilson Electronics, inc. petition to amend Part 20 of its rules to establish standards for the certification of signal boosters for subscriber use on CMRS networks by developing equipment certification requirements to ensure boosters are available to the public. GPD Telecom's opinion is that there is ample evidence that unauthorized signal boosters that poorly installed and or inappropriately commissioned have and continue to cause harmful interference to CMRS networks and system.

In rendering our comments, it is hoped that the FCC finds this response informative and helpful in making further rule determinations. GPD Telecom Inc. further contends that only through compliance of current FCC rules, regulation and sound engineering practices will the continued use of Signal Boosters be a benefit to the public and those entities serving the public good.

Sincerely,



John M. Todd, PMP
Project Manager
GPD Telecom, Inc.
jtodd@gpdgroup.com
330-283-6616



Richard F. Jimenez
Project Manager
GPD Telecom, Inc.
rjimenez@gpdgroup.com
330-283-6615