

Almost all commenting parties agree in one point: Signal boosters can enhance the network structure. Signal boosters increase coverage area, give coverage to dead zones and reduce the need for additional infrastructure in areas that can not currently justify additional base stations due to economic feasibility, environmental concerns, or traffic requirements.

Signal boosters are used in almost all areas due to network shortcomings; in rural areas to enhance weak signals on the fringe of cells; in suburban areas to cover dead zones created by topography; in urban cities to penetrate buildings.

Many consumers have changed to mobile phones as their sole means of telephone communication, and thus solid network coverage is critical to these users. It's not just a problem in rural America. Many homes in urban and suburban neighborhoods have coverage in the street, but lose coverage in their home, or in some parts of their home. For them, this becomes a disadvantage for business, personal freedom, and safety. Signal boosters overcome many of these issues.

In rural areas, signal boosters improve and extend the existing coverage, and thus in limited form, furthers the goals of the Rural Development Telecommunications Program, bringing telephone and broadband access to all people in the United States.

For many users listed above, professionally installed carrier-grade products are not an option, due to prohibitive costs. These products are generally meant to cover large areas such as hotels, airports, or valleys. However, for many wireless users, coverage of a small 100 to 3000 square feet area is adequate.

Allowing the carriers to set standards for boosters is not in the best interest of the public. The carrier's goal is to improve service for their own infrastructure, and not offer improvements for other networks. Carrier-grade repeaters (the solution carrier's are recommending) use limited, channel-select devices that have a number of disadvantages: 1) increase the cost for the consumer, 2) require site-specific setup and settings for the local network, and 3) obsolescence if a user changes carriers or moves geographically. Channel-select repeaters require down and up conversion, and often multiple channel filters. The bands can be 5, 10, or 15MHz wide, and carriers can have non-contiguous band plans. This makes the filtering a challenge, and each repeater needs to be appropriately set up for the coverage in the specific installation. Either the unit must be pre-configured, or a professional installer will need to prepare the product at the site. This fact is clearly not consumer friendly from both a cost and ease-of-use perspective.

In comparison, broadband boosters can be very affordable and work with all carrier networks. This provides users the benefit of mobile coverage where they need it and helps insure that any cell phone user in its range can make emergency calls. If a user changes carriers, the product still functions correctly. A product that works and serves the majority of service providers will stay out of the landfill.

CellLynx maintains that signal boosters must be transparent in the networks, thus not causing interference or extraneous signals. Requirements for signal boosters should be limited to ensuring compliance in not causing interference to the networks. This is already what the FCC rules and regulations attempts to do for all radio equipment. A few additions to the regulations specific to signal boosters can ensure compliance.

As a manufacturer of cell signal amplification technology and boosters, CellLynx committed extensive R&D funding to build products that are transparent to the carrier network. Toward that goal, the 5BARz Road Warrior is fully compliant with FCC regulations and is FCC certified.

That's why CellLynx supports that additional certification requirements should be established for self protection of the network. New certification rules should add requirements for:

- Reasonable method to protect against spurious signals / oscillation, even with improper installation
- Reasonable method to control output power to within FCC specified limits
- If the booster is not able to maintain controls above, the unit must self protect the network with an auto shutdown feature

These additional certification requirements should be limited to network protection. CellLynx maintains that the Commission, along with support from the manufacturers, should establish the new certification requirements. In the interest of consumers, the environment, and public safety, the rules should not limit scope for operation to one particular carrier at a time.

With properly designed and tested equipment, the installation can be done by the typical consumer, much the same way that consumers install television sets, activate mobile phones, install home WiFi routers, use FRS radios and low power FM transmitters, etc. These products can then become a consumer and carrier benefit without adversely affecting the networks.

In contrast, requiring professional installation and legalistic prior authorization from all relevant carriers limits the use of signal boosters to only wealthy citizens, certainly not the end goal of carriers, manufacturers, consumers, or the FCC.

CellLynx supports the Commission defining a minimum set of rules to ensure network transparency. This will provide carriers, installers and manufacturers the

most flexibility to continue to create and provide products that meet the typical consumer's needs. It does so without stifling design creativity or severely restricting access with burdens of individual carrier authorization and/or registration.