July 1, 2010

265 S. Federal Hwy #324
Deerfield Beach, FL 33441
www.smartbooster.net

EX PARTE
VIA ELECTRONIC FILING

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street SW
Washington DC 20554

Re: Petitions Regarding the Use of Signal Boosters and Other Signal Amplification Techniques Used with Wireless Services; WT Docket No. 10-4

Dear Ms. Dortch:

On Tuesday, June 29, 2010, Dr. Jeremy K. Raines, P.E., and Michael Millard of Smart Booster met with Roger Noel, Joyce Jones, and Jennifer Maisel from the Wireless Telecommunications Bureau, Bruce Romano and Ira Keltz from the Office of Engineering and Technology, Kathy Berthot, Priya Shrinivasan, Neal McNeil, Diane Law-Hsu and Sharon Weber from the Enforcement Bureau and Brian Butler from the Public Safety and Homeland Security Bureau to discuss signal booster issues raised in this proceeding.

Smart Booster made arguments on these topics consistent with its previous arguments in the docket, as well as the topics raised below:

Location Awareness for boosters, both in space and time, is essential and critical for the protection of present and future wireless networks.

Specifically, we stress that the Smart Booster is the only solution that is location aware, not only in space but also in time. Awareness in time is of critical importance. The memory card of the Smart Booster features an expiration date, beyond which it will automatically deactivate. No other booster provides this feature. Without it, boosters will continue to function indefinitely, even though they might become obsolete and harmful to future generations of cell phones, PCS handsets, and other wireless terminals. With the likelihood of tens of millions of boosters in circulation, lack of time awareness could cripple future wireless networks.

We seriously doubt that any broadband booster not incorporating location awareness and band-specific operation can remain compatible with future air interface standards. This will be especially true if carriers adopt different or competing standards.

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Adding Dynamic Control to boosters would make them unaffordable for most, if not all, consumers.

We agree with all of the "safeguards to prevent harmful interference" as requested by AT&T in its recent Ex Parte filing, except for one.[1] That one is the capability for real time, or in the words of AT&T, "dynamic" control. This feature would include instantaneous control of output power and remote deactivation. We strongly object to that feature for at least three reasons. First, the engineering details of that feature would drive the cost of a booster far beyond the reach of most, if not all, consumers. Second, the feature puts a disproportionate burden for interference prevention on boosters, when, in fact, a multitude of other interferors are present. These include other electronic devices, jammers, malfunctioning wireless Wi-Fi devices, halogen lamps in parking lots, and boosters not under the control of a particular carrier. Clearly, dynamic control is useless if the specific device causing the interference cannot be determined, and that will be the case if it is one of those other interferors. Third, implementing a real-time capability potentially requires a redesign of the wireless networks because they do not provide intrinsic support for the booster's identification, location, and control. There is no guarantee that industry will implement any of the necessary network changes within a reasonable period of time.

We noted that the "dynamic control" feature requested by AT&T is far more difficult to manage than simply updating the Memory Card of the Smart Booster, and that appears to be the only major objection of AT&T to that booster.

We agree with carriers that:

1) ***boosters must be authorized by carriers prior to activation;***
2) ***transmissions must be restricted to authorized frequencies;***
3) ***anti-oscillation circuitry must be a standard feature;***
4) ***boosters should be tested by the FCC and by industry; and***
5) ***the FCC should enforce penalties against non compliant BDA manufacturers.***

We agree with AT&T and other carriers that boosters must be authorized prior to activation. Further, we note that the Memory Card feature of the Smart Booster is the best way to implement that requirement.

We agree with AT&T and other carriers who have commented in these proceedings that boosters must transmit only on the frequencies authorized for use by the wireless provider whose signal is being boosted. We also agree that such transmissions be restricted to those specific geographic markets in which the carrier providing services is authorized to operate.

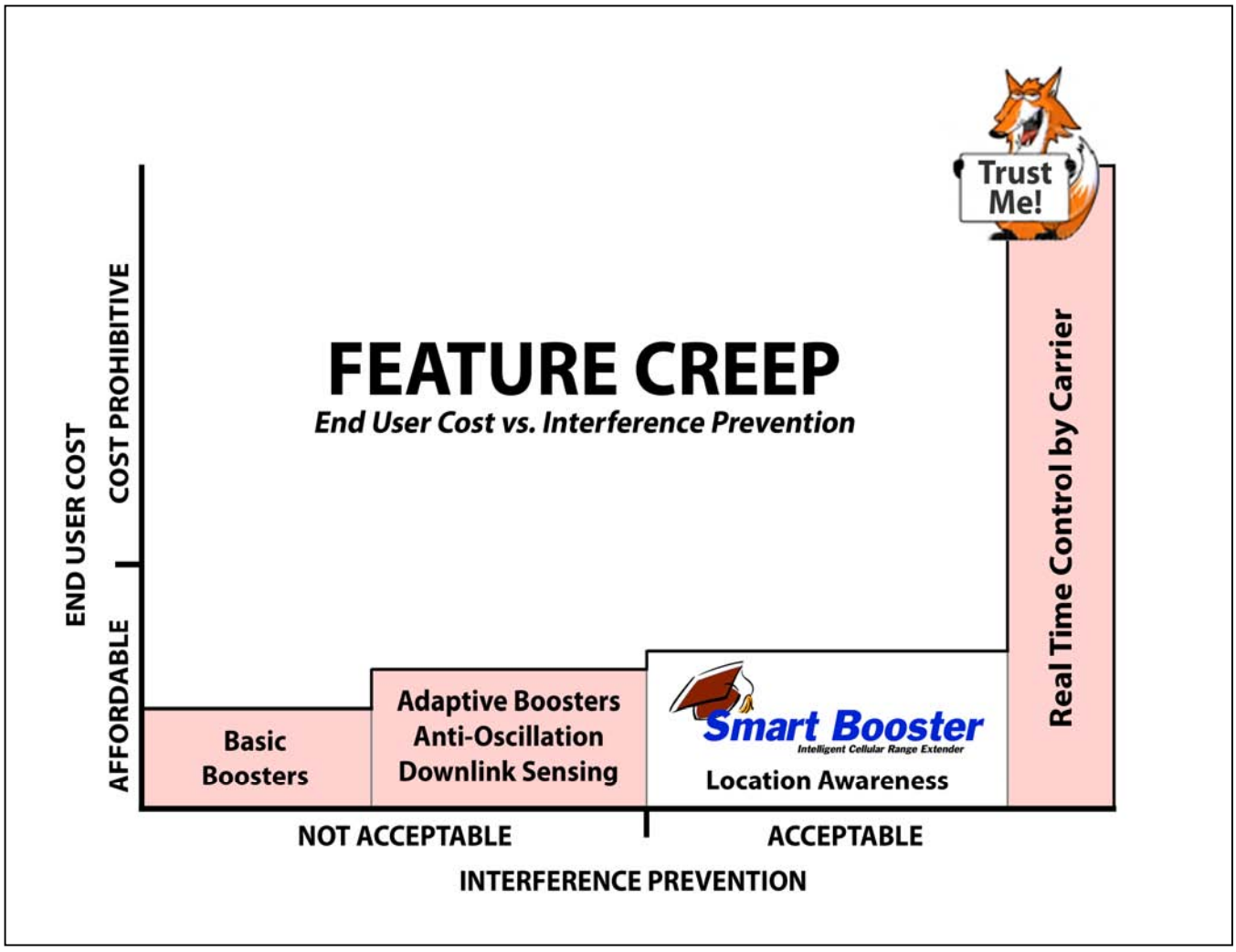
[1] WT Docket 10-4, Ex Parte Comments of AT&T, May 28, 2010, page 7-9.

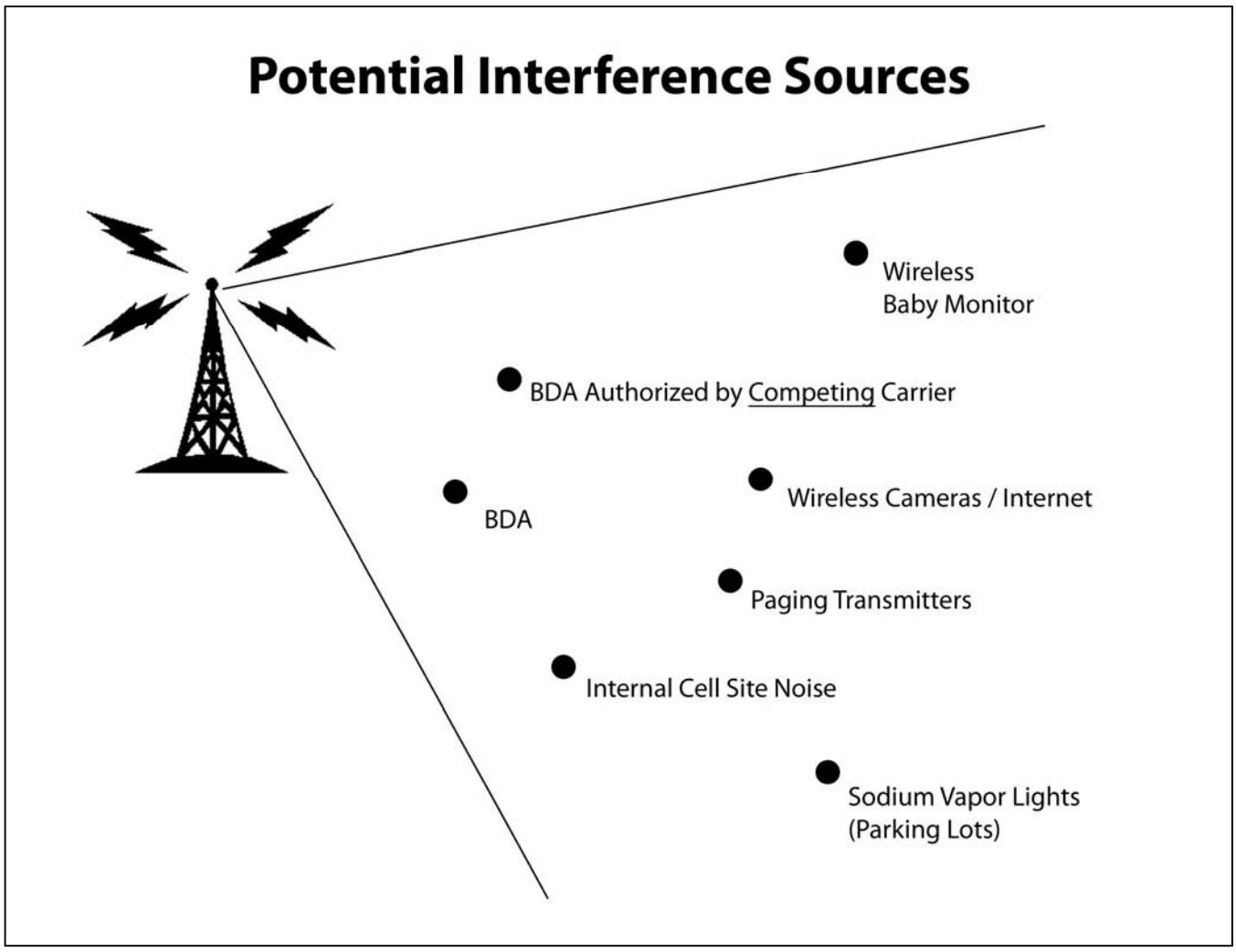
We agree with AT&T, other carriers, and the many metropolitan public safety entities that boosters must incorporate efficient and effective anti-oscillation circuitry.

We agree with AT&T, and other respondents that boosters should be jointly certified by the FCC and industry prior to activation. Joint certification, however, should be reserved for activation in geographic areas sufficiently close to base stations where the carriers have historically experienced, and are rightfully concerned about, most interference. In such areas, it would be the option of the carrier to prepare the Smart Booster memory card in detail, permitting activation for dead spots or prohibited zones in those areas. In sufficiently distant areas, however, we believe that only FCC authorization should be required prior to activation. That will remove some burden for testing from industry and prevent unnecessary delays in the deployment of boosters in the very regions where they are most essential, and historically have caused practically no interference.

Finally, we continue to agree that the FCC should bring prompt, appropriate enforcement action against any BDA manufacturer whose booster equipment is incapable of meeting applicable FCC Rules.

The following graphical presentations were circulated during our oral presentation:





Respectfully submitted,

Jeremy K. Raines, Ph.D., P.E.
Michael Millard

By: _____

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CERTIFICATE OF SERVICE

I, Jeremy K. Raines, Ph.D., P.E., do hereby certify that on this 1st day of July, 2010, I caused copies of the foregoing "Notice of Ex Parte Communications of Millard/Raines Partnership" to be delivered to the following via electronic or First Class US mail.

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Jeremy K. Raines, Ph.D., P.E.

Jeremy K. Raines, Ph.D., P.E.
For Millard / Raines Partnership

FCC 2.803 Compliance Notice:

Prototype - Not for Sale
The Smart Booster device has not been authorized as required by the rules of the Federal Communications Commission. This device is not, and may not be, offered for sale or lease, or sold or leased, until authorization is obtained.

Intellectual Property Notice: