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March 12, 2012

Ms. Marlene S. Dortch
Secretary
Federal Communications Commission
445 12th Street S.W.
Room 2-B450
Washington DC 20554

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Re: **RF Booster Rulemaking**
WT Docket No. 10-4

Dear Ms. Dortch:

This is to advise that on Friday, March 9, representatives of the National Association of Manufacturers and MRFAC, Inc. ("NAM/MRFAC"), and Member Companies thereof, met with Commission staff concerning issues raised in the above-referenced proceeding.

The NAM/MRFAC representatives in attendance were Brian Raymond, National Association of Manufacturers; Giselle Creaser, Lockheed Martin Corporation; Reid Avett, Duane Morris LLP; and the undersigned. In addition, Thomas Fagan, The Raytheon Company; Joseph Cramer, The Boeing Company; Marvin McKinley, Behrent Engineering Co. on behalf of MillerCoors LLC; Rich Elersich, Lockheed Martin Corporation; Don Barnett, Lockheed Martin Corporation; and Dan Hankins, Cessna Aircraft Company, attended by phone. Commission staff in attendance included Roger Noel, Chief, Mobility Division; and Thomas Derenge, Joyce Jones, Moslem Sawez, Erin Griffiths, and Becky Schwartz (by phone) of the Wireless Telecommunications Bureau. Brian Marengo attended for the Public Safety and Homeland Security Bureau.

The NAM/MRFAC representatives urged that Class B boosters continue to be permitted. It was observed that Class B boosters are used in numerous settings by manufacturers and other industrial users and that, if such boosters were prohibited, industrial users would be deprived of the cost and functionality advantages which Class B boosters continue to offer. For example, it was noted that where trunked systems with non-contiguous channels are employed, Class B boosters provide a simpler, more cost-effective solution than Class As.

NAM/MRFAC also described the use of Class B boosters to serve remote areas where the risk of interference is negligible, and urged that Rule 90.219 not be changed so as to preclude or otherwise limit such use. In this regard, it was stressed that the NAM/MRFAC representatives had not received any interference complaints in connection with these boosters. It was also noted that, in the combined experience of the Company representatives present, industrial boosters, whether used in confined spaces or in remote areas, are professionally installed. This is a point in marked contrast to the consumer boosters also at issue in the proceeding.

Commission staff inquired whether NAM/MRFAC Members have encountered any issues with first responders that required coordination. In response it was observed that many manufacturers have agreements with local first responders, including providing first responders with devices that utilize Class B booster signals. MRFAC representatives indicated their expectation that this long-standing practice would continue as a means of local coordination between first responders and manufacturers.

The NAM/MRFAC representatives further expressed the view that, in their experience, there is no need to increase the power of boosters; indeed, certain of the representatives described instances where a booster was padded since five watts was more power than needed. Commission staff indicated a willingness to consider proposals NAM/MRFAC might provide for clarification of the power, emission mask, and other technical standards to be allowed under the proposed rules; and subsequently referenced specific comments raising such issues.

The NAM/MRFAC representatives and the staff discussed the use of boosters post-800 MHz re-banding and a sunset date for current boosters. There was agreement that any sunset for 800 MHz boosters should be limited to re-banded frequencies only; NAM/MRFAC also observed that it would be in users' own interests to ensure that their units boosted the correct frequencies.

NAM/MRFAC representatives expressed the view that, while a registration requirement might be a prophylactic measure to aid in interference resolution, it was doubtful any such requirement would be effective as against the 2,000,000 some consumer boosters already deployed.

Commission staff and NAM/MRFAC discussed scenarios where wideband boosters incidentally boost an invitee's transmissions (e.g. in the case of local EMS personnel on premises for a medical emergency). There was a discussion of various alternatives by which the Commission might address any regulatory issues presented.

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A copy of this ex parte statement is being submitted for the docket via ECFS.

Sincerely,

A handwritten signature in blue ink that reads "William K. Keane". The signature is fluid and cursive, with a long horizontal flourish extending to the right.

William K. Keane

Cc: Roger Noel
Thomas Derenge
Joyce Jones
Moslem Sawez
Erin Griffiths
Becky Schwartz
Brian Marenco