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July 16, 2013

The Honorable Mignon Clyburn  
Acting Chairwoman  
Federal Communications Commission  
445 12th Street, SW  
Washington, DC 20536

**RE: Promoting Technological Solutions to Combat Contraband Wireless Device Use in Correctional Facilities, GN Docket No. 13-111**

Dear Acting Chairwoman Clyburn:

Thank you for the opportunity to offer comments on the above-referenced Notice of Proposed Rulemaking relating to contraband wireless use in correctional facilities. CellBlox, Inc., a portfolio company of SEKTYR International, provides cellular managed access solutions for a variety of applications including our nation's prison systems, secure government facilities, and airports. Given our experience in this space, we are keenly aware of the threat that contraband wireless devices pose to the safety of prison employees, prisoners, and the general public, and of the technical and regulatory challenges that currently exist when trying to implement technologies to combat these devices.

Streamlined Lease Application and Lease Notification Processing

We strongly support the Commission's proposal to immediately process long-term *de facto* lease applications and spectrum manager notifications for managed access systems and to require applications or notifications for managed access leases to meet the completeness standards set forth in the Commission's existing spectrum leasing rules. Further, we concur with the Commission's view that, in the managed access context, a lengthy case-by-case review and public notice is unnecessary regardless of whether a lease potentially raises competitiveness concerns or implicates designated entity rules, affiliation restrictions, unjust enrichment prohibitions, or transfer restrictions.

In regard to providing notification to households and businesses in the vicinity of a correctional facility with an installed managed access system (MAS), we believe this requirement is unnecessary and places an undue burden on the MAS provider. An MAS must be properly regulated so that “bleed over” does not occur into the community so that this is not an issue.

We support the Commission’s proposal to apply existing 911 and enhanced 911 rules to an MAS provider that transmits 911 and E911 calls on its system. We believe a proper MAS must be able to pass calls to 911 or E911. A public safety issue is created if a phone is inappropriately captured and cannot make an emergency call.

In regard to proposed changes to Special Temporary Authority (STA) request processing, we support the Commission’s proposal to streamline the approval process and process STA requests for managed access systems in correctional facilities without prior public notice.

#### Deployment of Detection Systems

We agree with the Commission’s assessment that detection systems are not a good alternative and unnecessarily threaten the safety of correctional facility workers. We therefore oppose proposals to identify and terminate service to contraband devices because we believe that it is not a workable solution and places an undue burden on the correctional facility as well as the carrier. Permitting wardens to transmit termination requests by e-mail or fax raises a whole host of additional questions – What is the service level agreement between the carrier and the correctional facility? When does the carrier have to respond to an e-mail or fax? Who determines which carrier? How do they stop carrier hopping?

In conclusion, we appreciate the Commission’s interest in this critically important issue of contraband wireless devices in prisons and support its efforts to remove any unnecessary and overly burdensome barriers related to the safe and efficient deployment of new systems to combat these devices. We also thank you for your time and consideration of our comments. Please do not hesitate to contact me if you have any additional questions or would like any additional information.

Respectfully submitted,



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