Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of	)	
	)	
Safer Buildings Coalition,	)	RM-12009
Petition for Rulemaking on Part 90	)	
Signal Boosters	)	

To: Chiefs, Public Safety and Homeland Security Bureau and
Wireless Telecommunications Bureau

REPLY COMMENTS
OF THE
ENTERPRISE WIRELESS ALLIANCE

The volume and consistency of Comments in response to the Petition for Rulemaking[1] filed by the Safer Buildings Coalition ("SBC") emphatically answer the primary question in the September 16, 2025 Public Notice[2] from the Federal Communications Commission's ("FCC") Public Safety and Homeland Security Bureau and Wireless Telecommunications Bureau (collectively, "Bureaus"): The SBC is correct that improperly deployed signal boosters broadcasting public safety frequencies cause pervasive interference to other public safety radio communications.[3] This has been confirmed by multiple organizations representing public safety licensees,[4] by public safety entities,[5] by professional entities that install and maintain public safety

[1] Safer Buildings Coalition Petition for Rulemaking (filed Jul. 22, 2025) ("Petition").
[2] *Public Safety and Homeland Security Bureau and Wireless Telecommunications Bureau Seek Comment on Safer Buildings Coalition Petition for Rulemaking on Part 90 Signal Boosters*, Public Notice, RM-12009, DA 25-853 (Sept. 16, 2025) ("Public Notice").
[3] *Id*. at 2.
[4] *See, e.g.*., International Association of Fire Chiefs ("IAFC"), National Fire Protection Association ("NFPA"), Industry Council for Emergency Response Technologies ("iCERT"), International Association of Chiefs of Police ("IAFC"), Government Wireless Technology & Communications Association ("GWTCA"), and APCO International ("APCO").
[5] *See., e.g.*, San Francisco Department of Technology; County of Los Angeles; Oakland County, MI; New Jersey State Police; Douglas County, NV; Placer County, CA; Port Authority of New York and New Jersey; Montgomery County PA; State of Indiana Integrated Public Safety Commission; Puget Sound Emergency Radio Network (King County, WA); Suffolk County, NY; City of Chattanooga, TN.

systems,[6] by specialists in Emergency Responder Communications Enhancement Systems ("ERCES"),[7] and by vendors of public safety systems and signal booster equipment.[8] There is unanimous support for initiation of a proceeding to consider how the FCC might address this situation.

The SBC Petition proposed a highly detailed process for securing consent from a public safety licensee to rebroadcast its frequencies using a Class A signal booster.[9] It recommends the public safety licensee prepare a document of SBC's identified extensive, but according to the Petition not exhaustive, technical and other information the requesting party must provide regarding the proposed installation, as well as contact information for the building owner/manager and the Authority Having Jurisdiction ("AHJ") and an interference analysis for the building and, if appropriate, the campus. The public safety licensee is then to evaluate the information provided based on multiple criteria. If consent is granted, the requesting party would then register the Class A signal booster following the current Class B signal booster registration process in section 90.219(d)(5), albeit with expanded information provided. The Petition also recommends enhanced equipment labeling and manufacturer instruction.[10]

The record supports requiring registration of Class A signal boosters, at least those rebroadcasting public safety frequencies.[11] Beyond that, the question is what regulatory mechanism(s) would be most effective in reducing instances of interference. SBC and many

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[6] *See, e.g.*, Industrial Communications and Electronics, Inc. ("ICE"), Mission Critical Partners ("MCP"), Mobile Communications America ("MCA"), CSI Telecommunications, Inc. ("CSI"), Comba Telecom, USA. Airwavz Solutions, Inc. and Telecommunications Engineering Associates ("TEA")

[7] *See, e.g.,* Airtower Networks, Acceswave Wireless, Inc., RFSignalman, Nextivity, Inc., Commdex LLC.

[8] *See, e.g.*, JVCKENWOOD USA Corporation ("JVCK"), EF Johnson Technologies, Inc., ("EFJ"), Motorola Solutions, Inc ("MSI"), Advanced RF Technologies, Inc. ("ADRF").

[9] Petition at pp. 11-15.

[10] Petition at 17-18.

[11] In its Comments, the Enterprise Wireless Alliance recommended that any additional requirements imposed on "Industrial" Class A signal boosters apply only when public safety frequencies are involved. Signal boosters installed by Industrial/Business licensees in their own facilities to provide coverage of dead spots are not the source of interference and should not be subject to the regulations under consideration in this proceeding. EWA Comments at 2.

commenting parties believe a more expansive FCC role is most likely to achieve that end. The Petition puts primary responsibility for resolving a public safety interference problem squarely where it should reside - on the public safety licensees whose frequencies are to be rebroadcast. But its solution is predicated on the assumption that entities installing signal boosters will seek consent from those licensees, a provision already required by the rules and apparently ignored all too frequently.[12] Erecting a much more "structured authorization" framework[13] will be effective only to the extent that parties involved in signal booster installations understand and follow FCC requirements when they've not necessarily done so in the past.

While EWA does not oppose the SBC proposals, it wonders if more intensive regulatory requirements might have the contrary effect. If the effort required to register a Class A signal booster is significantly more demanding than the current rules that are not always followed, compliance may be reduced. Therefore, EWA suggests that the more measured approach outlined in its Comments and expanded below, one imposing a level of responsibility for vendors of signal boosters and greater reliance on localized solutions might produce equally good results and should be considered at least on an interim basis while the more complex SBC proposal is under discussion.

EWA's Comments made two simple and we would expect non-controversial suggestions in addition to supporting Class A signal booster registration. It recommended the registering entity be required to obtain an FCC Registration Number ("FRN"), thereby bringing it squarely within

[12] A number of comments suggest that one element needed to address this interference problem is defining what is meant by obtaining "the express consent of the licensee(s) on the frequencies for which the device or system is intended to amplify" in section 90.219(b)(1)(ii). This suggests that parties installing signal boosters on public safety frequencies don't understand "express consent" requires communication with and agreement from the public safety licensee, although what else it could mean is not obvious. More likely, the entities doing the installation are either unfamiliar with FCC requirements, in which case defining the term will not help, or choose to ignore it. EWA is unclear how defining that term will have any meaningful impact on this issue, but defers to the public safety community that believes it will.

[13] Public Notice at 2.

the FCC's jurisdiction and providing a point of contact for a party experiencing interference from that signal booster. It also suggested expanding section 90.427(b) to make it unlawful to register a Class A signal booster without express consent from the public safety licensee and compliance with all FCC and other applicable requirements.

However, like the SBC proposals, these rest on an assumption that parties will now follow FCC rules. For that reason, EWA urges the FCC to give serious consideration to the following suggestion in the joint Comments of JVCKENWOOD USA Corporation ("JVCK")/EF Johnson Technologies, Inc., ("EFJ") that would place greater reliance on marketplace forces. They propose including a role for vendors selling public safety signal boosters before these devices are installed, entities with proven knowledge of and historical compliance with FCC requirements: [14]

> ….JVCK and EFJ recommend that the Commission extend compliance responsibility upstream to include manufacturers and vendors of signal boosters, commonly referred to as bi-directional amplifiers (BDAs). Specifically, **manufacturers, distributors and unlicensed installers of BDAs should be required to (a) obtain and retain documented proof of "express consent" from the applicable frequency licensee prior to releasing any Part 90 signal booster to the end customer; and (b) verify successful registration of the device in the Commission's signal-booster database (Class A or B) before shipment or activation**. Such measures would create an additional compliance checkpoint ensuring that devices are sold and deployed only after proper authorization has been secured. They would also reinforce the intent of the rule that only licensee-approved systems should be placed into service, reducing instances of inadvertent deployment of unauthorized equipment by uninformed, non-technical purchasers, and promoting a shared-responsibility model across the supply chain in which manufacturers, vendors, integrators, and licensees collectively safeguard the integrity of public-safety radio networks.[15]

Just as vendors are responsible for ensuring the equipment they sell is FCC-compliant technically, this pre-installation validation would provide significant protection against interference. It would ensure the public safety licensee has granted express consent to the retransmission of its

[14] SBC and others also have called for improved labelling of these devices and additional instruction manual requirements. Petition at 17-18.
[15] JVCK/EFJ Joint Comments at 6-7 (emphasis added).

frequencies and would give that licensee the opportunity to impose whatever installation and other conditions it deems necessary for its interference-free operation.[16]

The Bureaus question whether other solutions might help address this interference, including importing certain rules that apply to consumer signal boosters under section 20.21.[17] Specifically, they ask if public safety signal boosters, like commercial boosters, should have a self-monitoring capability that would shut them down automatically if improper installation is indicated. A number of commenters supported imposing that requirement.[18] EWA agrees but wonders about the timing and cost of adding that capability. AHJs increasingly are requiring reliable public safety communications within buildings. The FCC should adopt rules promptly that would have a measurable impact on this situation in the shorter term while pursuing additional measures that may require more time to implement.

The Comments also offer examples of jurisdictions that have achieved good results by involving the various parties involved in deployment of signal boosters on public safety frequencies: public safety licensees and those with oversight of their operations, AHJs, building owners/managers, and third-party integrators. The San Francisco Department of Technology has adopted a program for tracking all public safety booster installations by working with AHJs and building owners, by imposing technical requirements on new boosters and annual inspections of installed devices, by overseeing the qualifications of those installing the devices, and by having means for detecting and addressing interference when it does occur, including by beginning the process of implementing a remote shut down requirement.[19] It is an excellent example of how proactive public safety management of its spectrum has filled any gaps in FCC regulations.

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[16] EWA, like others, notes any rule changes typically would apply to future signal boosters, not the devices already installed and causing interference. The FCC should consider requiring installed devices to register within some period of time and annual inspections of all public safety signal boosters, whenever installed, to promote ongoing compliance.
[17] Public Notice at 2.
[18] *See, e.g.*, APCO International Comments at 5; Commdex LLC Comments at 2.
[19] San Francisco Comments at 6-7.

Mobile Communications America, Inc. ("MCA") identified the State of South Carolina as another example of public safety assuming responsibility for managing public safety signal boosters, in this case on its statewide Palmetto 800 system. MCA explains there "is an open dashboard that allows all parties involved access to signal booster information that is critical in interference situations. The SC Division of Technology Operations has created a packet of information and dashboard that streamlines signal booster deployments and minimizes potential for incorrect installations."[20] Other jurisdictions may have taken similar steps, and all should be encouraged to do so. Local coordination among the parties involved unquestionably is the optimal approach for avoiding interference and resolving it when it does occur.

APCO International, on the other hand, has volunteered to act as a national "coordinator" of new signal booster deployment requests, suggesting they could be submitted to it for verification of technical parameters and compliance with FCC requirements, routed to the affected public safety licensee for consent once the request has been determined to be valid, and then registered with the FCC.[21] Public safety licensees, of course, are free to engage any third-party resources they wish in carrying out their responsibilities. If some believe it would be better to have an FCC-certified Frequency Advisory Committee ("FAC")[22] preview booster requests instead of relying on their own personnel with specific knowledge of local conditions, they can do that. But that should not be an FCC requirement. It would simply add time and cost to jurisdictions like San

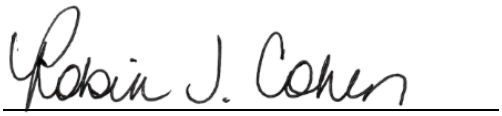
[20] MCA Comments at 2.
[21] APCO Comments at 6-7, citing to the Petition at 15.
[22] The Government Wireless Technology & Communications Association ("GWTCA") Comments provide an orienting, detailed history of FCC signal booster rules, but also make the curious statement that the number of non-profit FACs are "ever-decreasing" because "the Part 90 coordination process is a program that is financially difficult to maintain." GWTCA Comments at 10. EWA cannot speak to the financial status of other non-profit FACs, but its entirely internal coordination process is healthy and thriving. In support of its statement, GWTCA points to the recent decisions of MRFAC, Inc. to surrender its FAC status in 2025. The other example, the American Trucking Association, surrendered its status 25 years ago in 2000. The 11 other FACs all have been providing frequency coordination services to Part 90 licensees for decades.

Francisco, South Carolina, and others that have procedures in place to handle signal booster requests.

The public safety community has made clear its desire for a Notice of Proposed Rulemaking regarding Class A public safety signal boosters. EWA urges the FCC to initiate a proceeding promptly consistent with the recommendations herein.

Respectfully submitted,

ENTERPRISE WIRELESS ALLIANCE

By: 

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