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

COMMENTS
OF THE
ENTERPRISE WIRELESS ALLIANCE

The Enterprise Wireless Alliance ("EWA") respectfully submits its comments on the Petition for Rulemaking[1] filed by the Safer Buildings Coalition ("SBC"). The Petition proposes a comprehensive regulatory framework to address ongoing, documented interference to public safety systems from unauthorized, improperly installed, and/or not properly maintained signal boosters regulated under Federal Communications Commission ("FCC") section 90.219.[2] By Public Notice dated September 16, 2025,[3] the Public Safety and Homeland Security Bureau and the Wireless Telecommunications Bureau (collectively, "Bureaus") have requested comment on the Petition. Specifically, the Public Notice asks whether SBC is correct that there is a pervasive problem that "improperly deployed signal boosters cause interference to public safety radio

[1] Safer Buildings Coalition Petition for Rulemaking (filed Jul. 22, 2025) ("Petition").
[2] This rule section governs all Private Land Mobile Radio Service ("PLMRS") signal boosters, public safety and industrial/business. In fact, as made clear in the Petition, it is signal boosters retransmitting public safety frequencies that are experiencing and sometimes creating interference. Industrial/business signal boosters typically are installed by the licensee at a facility under its control where it needs additional coverage. EWA is unaware of any significant interference situations involving their signal boosters.
[3] *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").

communications"[4] and whether SBC's proposed section 90.219 revisions address that problem. It also asks whether other solutions might address this interference, including importing certain rules that apply to consumer signal boosters under section 20.21.

EWA agrees with SBC that the interference to public safety communications from unauthorized signal boosters is a significant problem, and one that is likely to increase as building codes adopted by Authorities Having Jurisdiction ("AHJ") increasingly are requiring public safety coverage within buildings. EWA represents a significant number of businesses that install and maintain public safety radio systems and are routinely enlisted to try to track down and fix signal boosters causing interference – a time-consuming, frustrating task. It therefore supports SBC's ongoing efforts to highlight the critical nature of this problem and agrees that FCC rule changes are needed to address it.

However, in conjunction with whatever rule changes are adopted to address that issue, EWA recommends that they apply only to signal boosters retransmitting public safety frequencies. Section 90.219 also applies to the deployment of Class A signal boosters by industrial/business licensees retransmitting their own frequencies to eliminate dead spots in their own facilities, typically large industrial plants. This is an entirely different situation than the problem SBC is seeking to address. The location and installation of those signal boosters is directed by the licensee of the frequencies. The regulatory structure proposed in the Petition is unnecessary and would be unduly burdensome for those facilities.

[4] *Id.* at 2.

I. THE SBC PROPOSAL

The Petition proposes an extensive regulatory process to address what it describes as the three root causes of the Part 90 signal booster problem:

1. Failure of System Installers and Designers to Follow FCC Rules;
2. Lack of RF Design and Installation Competency; and
3. Regulatory Framework Gaps from 2013 Rulemaking.[5]

The Petition recommends that licensees whose frequencies are to be retransmitted adopt a detailed checklist of information to be provided by the entity seeking consent to install the signal booster.[6] It outlines the criteria by which licensees should evaluate whether consent should be granted and proposes conditions that could be imposed if consent is granted.[7] Further, it urges that both Classes A and B signal boosters be required to register with the FCC and itemizes the information it believes should be included in that registration.[8]

SBC has spent more than a decade pursuing its mission of "eliminating in-building wireless 'dead zones' while combating harmful RF noise and interference."[9] Its expertise in this area is extensive. Thus, EWA does not question that its recommendations, if adopted by the FCC and implemented by the industry, would have a major impact on the current interference situation. However, since it appears even the existing, relatively minimal rules are not followed routinely, in particular, the requirements that non-licensees installing signal boosters obtain the "express consent" of the licensee[10] and that licensees must "maintain a reasonable level of control over

[5] Petition at 9-11.
[6] *Id*. at 11-13.
[7] *Id*. at 14.
[8] *Id*. at 15.
[9] *Id.* at 5.
[10] Section 90.217(b)(1)(i).

these operations in order to resolve interference problems,"[11] EWA suggests that more limited requirements could help address the problem on an expedited, perhaps an interim, basis.

II. AN ALTERNATIVE, INTERIM PROPOSAL

The value of in-building public safety coverage is obvious. Implementation is the problem due in part to the absence of any meaningful process for identifying and imposing accountability on the various parties involved: the AHJ that requires the installation, the owner/manager of the building in which the booster is installed, the entity hired to install it, and the public safety licensee whose frequencies are being retransmitted. The lack of coordination among these entities too frequently means that when interference occurs it is difficult to identify the source, much less who is responsible for whatever went wrong. The optimal result of this proceeding would have these entities collaborate in the process, in particular ensuring that the public safety licensee has given express consent to the booster deployment and has assumed responsibility for maintaining the level of control required by the FCC rules. EWA submits that some modest rule changes also could significantly help to address the problem.

First, as recommended by SBC, experience has demonstrated that Class A signal boosters, like Class B, should be registered. The presumption that channelized Class A boosters would not present a significant interference problem has proven incorrect as they are routinely installed by non-licensees and are not always under the control of the licensee whose frequencies are being retransmitted.. Registering the booster to be installed, at a minimum, by licensee, call sign, frequency(s), street address and coordinates would help parties experiencing interference identify the source of the problem. Registration should also include a certification that the registrant will

[11] Section 90.217(b)(1).

be responsible for maintaining the equipment and will take appropriate measures to prevent the equipment from causing interference which could be enforced through a mandatory maintenance obligation.

Second, entities registering signal boosters under section 90.219 should be required to have an FRN that is included in the registration filing. This will provide interested parties with an individual, an email address, a mailing address, and a phone number to contact when necessary.

Third, EWA recommends that the FCC modify section 90.427 as follows:

§ 90.427 Precautions against unauthorized operation.

(a)****.

(b) Except for frequencies used in accordance with § 90.417, no person shall program into a transmitter (1) frequencies for which the licensee using the transmitter is not authorized; or (2) if the transmitter is a signal booster authorized under rule section 90.219, frequencies for which the person has not obtained express written consent to retransmit from the licensee and satisfied all other applicable rule section 90.219 requirements for signal booster operation.

As explained in the Petition, a significant number of signal boosters are installed improperly by entities with no expertise in this area. Too frequently, building owners engage businesses that install fire alarms or have other non-RF experience to do this work. This rule change would give the FCC the ability to take enforcement action against an entity that does not comply with those requirements. A few well-publicized enforcement actions can have a meaningful impact on parties that otherwise do not even consider FCC rules when installing boosters, and EWA would assist in their publication.

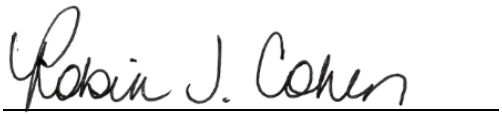
III. CONCLUSION

SBC has provided the FCC with a detailed roadmap for addressing an interference problem that, for a decade, has resulted in interference that directly impacts public safety operations. As

more AHJs require the installation of signal boosters, a requirement intended to promote public safety, EWA urges the FCC to initiate a proceeding that acknowledges the problem and proposes rule changes to address it.

Respectfully submitted,

ENTERPRISE WIRELESS ALLIANCE

By: 

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