

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

In the Matter of)
)
Enhancements to Universal Licensing) WT Docket No. 14-161
System and Antenna Structure Registration)
System for Access to Official Electronic)
Authorizations)

To: Chief, Wireless Telecommunications Bureau

**COMMENTS
OF THE
ENTERPRISE WIRELESS ALLIANCE**

The Enterprise Wireless Alliance (“EWA” or “Alliance”), in accordance with Section 1.45 of the Federal Communications Commission (“FCC” or “Commission”) rules, respectfully submits its comments in response to the Public Notice describing enhancements to the FCC’s Universal Licensing System (“ULS”) and Antenna Structure Registration (“ASR”) System to permit licensees and ASR registrants electronic access to their official, active authorizations and seeking comment on final procedures associated therewith.¹ The Alliance endorses the steps already taken by the Wireless Telecommunications Bureau (“WTB”) as described in the Public Notice and offers the following comments in response to the proposed further enhancements.

EWA represents a broad alliance of business enterprise users, service providers, radio dealers and technology manufacturers, many of which hold licenses that are included in ULS and are ASR registrants. The Alliance is an FCC-certified Frequency Advisory Committee (“FAC”) that coordinates and files with the Commission approximately 9,000 to 10,000 Part 90

¹ Wireless Telecommunications Bureau Announces Enhancements to the Commission’s Universal Licensing System and Antenna Structure Registration System for Providing Access to Official Electronic Authorizations and Seeks Comment on Final Procedures, *Public Notice*, WT Docket No. 14-161, DA 14-1478 (rel. Oct. 10, 2014) (“Public Notice”).

applications annually. It also offers an application preparation service to assist applicants in securing the FCC authorizations needed to meet their communications requirements. Because of its deep involvement in FCC licensing matters, EWA can confirm that the migration from an entirely paper licensing process to electronic filings in ULS has significantly improved both the licensing process itself and the access to license information for the benefit of all Commission licensees. The ASR System has provided comparable enhancements to the antenna registration process. While neither system is perfect and both would benefit from modifications that have not been implemented due to budget constraints, they are vastly superior to the previous paper procedures and offer a meaningful benefit to the FCC's constituents.

The Public Notice announces a common sense decision to designate the electronic version of an authorization stored in ULS or the ASR System, versions that include the Commission's seal, as the official Commission document under the Federal Records Act of 1950 and the Communications Act of 1934, as amended. By contrast with a paper authorization, which has an FCC seal but may be outdated, the electronic version, by definition, captures the most current iteration of an authorization or registration. The official version cannot be downloaded by the public, but may be accessed only by authorized persons able to log into the password-protected License Manager in ULS or ASR Dashboard in the ASR System. Licensees and registrants are able to download, print, and save copies of these official documents as they deem necessary or as the FCC rules require.

This decision allows the FCC to propose another eminently practical, cost-effective measure: the elimination, to the extent acceptable, to licensees and registrants of the distribution of paper copies of licenses and registrations. The Public Notice seeks comment on the proposal to stop the current practice of sending paper copies of all such documents through the U.S. Postal

Service and, instead, send paper copies only when affirmatively requested to do so by the licensee or registrant. As explained in the Public Notice, “Given the ease of access to the Internet, the ubiquitous availability of electronic documents, and the high adoption rate by consumers of electronic delivery of many other documents, the Bureau believes that the time is ripe for modernizing the treatment of authorizations.”²

EWA agrees. While some licensees and registrants may elect to continue receiving paper copies, an option provided for by the FCC, the Alliance anticipates that a significant number of parties will choose to rely on electronic documents, if not immediately, then over time as the process becomes more familiar. This option will be particularly helpful for entities with a significant number of authorizations when they make an administrative change to their information, for example, to update a contact name or mailing address, an action that now triggers reissuance and mailing of each modified authorization. EWA also expects that some parties may choose the third alternative proposed in the Public Notice whereby authorizations would be delivered via email.

EWA supports the Commission’s decision to provide several alternative to the current process. Entities have different internal processes for handling FCC authorizations that may be better suited to one approach versus another, at least initially, although the Alliance would hope that electronic documents will become the norm. The Alliance will work with its members to familiarize them with the various options. It will assist those who need help in navigating License Manager in ULS or ASR Dashboard in the ASR System, systems that may appear easily accessible to those who use them frequently, but that can be daunting to the uninitiated. EWA provides this assistance today and will continue to do so as entities familiarize themselves with the authorization delivery options identified in the Public Notice.

² Public Notice at 3.

Although outside the scope of this proceeding, EWA also recommends that the FCC consider modifying its rules requiring Part 90 licensees to maintain a physical copy of the authorization for base and other fixed stations, even if only a photocopy, at every station control point.³ A predicate of the Commission’s effort to migrate from paper to electronic authorizations is “the ease of access to the Internet...”⁴ Since there is no way to confirm that the license copy posted at the control point is valid and current without verifying its accuracy by comparing it to the ULS reference copy, it is not clear what value the paper copy has on its own. EWA supports retention of the requirement that licensees retain copies of their authorizations as part of their station records, since this will help ensure that someone reviews each license as it is granted, even if the retained version is a “soft” copy stored in the licensee’s electronic files. However, it is not obvious what regulatory or enforcement purpose is served by requiring that a photocopy of every license be posted at every control point. This requirement is antiquated and should be eliminated, similar to the past obligation that licensees maintain a hard copy of the FCC rules governing the operation of their radio systems. Because those rules are readily available through several online sources, the FCC wisely removed that obsolete requirement. It should do the same with respect to the maintenance of paper “hard copy” licenses at control point locations.

³ 47 C.F.R. §90.407(a) and (b).

⁴ *See* n. 2 *supra*.

The Alliance appreciates the FCC's initiative in proposing these enhancements to ULS and the ASR System. It will be pleased to assist its members and the Commission in any way possible during the transition from an entirely paper authorization process to a modernized electronic system.

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November 11, 2014