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

In the Matter of	)	
	)	RM-12009
Revision to 47 CFR Part 90 rules for Public Safety Communications and Signal Boosters	)	

REPLY COMMENTS OF THE WIRELESS INFRASTRUCTURE ASSOCIATION

The Wireless Infrastructure Association ("WIA")[1] respectfully submits these reply comments in response to the Commission's request for comments on the Safer Buildings Coalition ("SBC") Petition for Rulemaking to revise Section 90.219 of the Commission's rules governing industrial signal boosters and to highlight the strong support in the record for the Commission to develop more workable rules for these deployments.[2] Comments in the record representing entities including public safety professionals, industry, and technical experts, reflect a broad consensus that the current regulatory framework is inadequate and that a comprehensive authorization process is needed to protect public safety communications and ensure that in-building deployments can be responsibly facilitated.[3] Accordingly, WIA supports the Commission proceeding with a rulemaking in this docket to develop consistent rules of the road for these types of deployments.

[1] The Wireless Infrastructure Association ("WIA") represents the businesses that build, develop, own, and operate the nation's wireless infrastructure. Members include infrastructure providers, wireless carriers, and professional services firms that are responsible for telecommunications facilities around the globe.

[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*, RM-12009 (rel. Sept. 16, 2025).

[3] *See generally*, Comments of Airwavz, RM-12009 (Nov. 18, 2025); Comments of Association of Public-Safety Communications Officials, International, RM-12009 (Nov. 18, 2025) ["APCO Comments"]; Comments of International Association of Chiefs of Police, RM-12009 (Nov. 18, 2025) ["IACP Comments"];Comments of International Association of Fire Chiefs, RM-12009 (Nov. 18, 2025) ["IAFC Comments"]; Comments of Motorola Solutions, Inc., RM-12009 (Nov. 18, 2025); Comments of NATE: The Communications Infrastructure Contractors

WIA generally supports the Commission proceeding to a Notice of Proposed Rulemaking ("NPRM") in this proceeding, consistent with SBC's petition, in order to solicit further input from industry and other stakeholders to develop workable rules for these deployments and that support public safety operations. In any subsequent rulemaking, WIA also encourages the Commission to consider the following suggestions from commenters including:

- Provide procedural details for how express consent from spectrum licensees is obtained;[4]
- Create a standard approval and registration process and enable the Commission to verify compliance more efficiently;[5] and
- Encourage all in-building public safety systems and signal boosters to be compatible with Enhanced 911 (E911) and Next Generation 911 (NG911) services.[6]

WIA believes these recommendations will substantially assist in the Commission developing a regulatory environment to deliver high-quality installations, ensure proper coordination, and reduce interference incidents which can imperil public safety communications.

As SBC provides in its Petition, there is a substantial need for more clarity in the Commission's rules governing the deployment of industrial signal boosters under Part 90.[7] This is supported by numerous commenters; many of who also highlight that the Commission's rules have not been updated since they were first adopted in 2013.[8] These regulatory gaps have led to

Association, RM-12009 (Nov. 18, 2025) ["Comments of NATE"]; Comments of Nextivity, RM-12009 (Nov. 18, 2025).

[4] *See, e.g.*, Safter Buildings Coalition, Petition for Rulemaking at 11-13 (July 22, 2025) ["SBC PFR"]; Comments of NATE at 2.

[5] *See, e.g.*, SBC PFR at 12; Comments of APCO at 4-5.

[6] Comments of Airwavz at 2.

[7] *See* SBC PFR at 5-6.

[8] *See, e.g.*, SBC PFR at 5-6; Comments of Nextivity at 1.

poorly coordinated or inconsistent deployments which can lead to service gaps and harmful interference.[9] These connectivity issues are particularly acute in this context due to the public safety implications.[10]

Commenters support this conclusion and provide real-world evidence that the lack of regulatory clarity has led to significant complications in providing consistent in-building coverage.[11] This lack of standardized process for equipment authorization and licensee consent has enabled inconsistent deployments that presents complications for in-building coverage, including critical public safety operations.[12]

Ensuring consistent indoor coverage, while preventing any harmful interference, is a critical objective for the wireless industry to support consumers and public safety professionals alike. However, outdated or ambiguous Commission rules have led to inconsistent and conflicting deployments that should be addressed. Accordingly, WIA encourages the Commission to act swiftly in granting SBC's petition and proceed to a NPRM in this proceeding to adopt clear and consistent rules in line with recommendations from SBC and the many commenters who support it in the record.

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[9] *See* Comments of Airwavz at 1 (providing that the regulatory gaps in part 90 have contributed to a "hodgepodge of commercial wireless systems utilizing unregulated signal boosters . . . that often interfere with outdoor network and properly designed and maintained in-building systems.").

[10] Comments of APCO at 8 ("The public safety community requires reliable and interference-free communications inside buildings and other complex environments."); Comments of IAFC at 1 ("The problem of improperly deployed signal boosters is being seen by public safety agencies all over the country. It causes unnecessary interference and impedes our lifesaving operations."); Comments of IACP at 1-2 (discussing the fundamental changes in the public safety communications landscape since 2013 which requires FCC action).

[11] *See Petition for Rulemaking*, Appendix II; Comments of APCO at 3.

[12] *See supra* note 7 (highlighting comments which provide specific impacts to the public safety community from inconsistent rules).

Respectfully submitted,

/s/ Stephen Keegan
Stephen Keegan
Senior Counsel, Government & Legal Affairs

WIA – The Wireless Infrastructure Association
2111 Wilson Blvd., Suite 210
Arlington, VA 22201
800.759.0300

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