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Proceeding Detail

Docket Number RM-12009

Docket/Proceeding Title PETITION FOR RULEMAKING

ON PART 90 SIGNAL

BOOSTERS

Bureau Name Public Safety & Homeland

Security Bureau

Date Created Sep 15, 2025

Total Filings 2

Tags INDUSTRIAL/BUSINESS PRIVATE LAND MOBILE RADIO PUBLIC SAFETY

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SBC FCC Petition for Rulemaking

Date Filed: July 22, 2025



SCAN ME

FAQ Link

https://sbcfastlink.org/fcc-bda

FAQ Page Contents:

- Executive Summary
- What is the FCC Seeking Comments On?
- Why Should You File Comments Now?
- What's at Stake for Each Stakeholder Group?
 - Public Safety Agencies (Fire, Police, EMS)
 - Public Safety Radio System Operators (Frequency License Holders; Licensees)
 - Authorities Having Jurisdiction (AHJs) Fire and Building Code Officials
 - Signal Booster Manufacturers
 - ERCES System Integrators
 - Building Owners and Property Managers
- How to Make Your Comments Most Effective
- Specific Questions the FCC is Asking
- Filing Deadlines and Process
- Background Info



Why We Filed This Petition

- •Rapid growth in fire code-required coverage deployments
- Regulatory gap exposed during significant deployment expansion
- •Essential technology without coordination framework causing problems
- Multiple organizations documented coordination challenges (DHS/CISA, APCO, SBC)
- Need standardized procedures for existing "express consent" requirement

Before the FEDERAL COMMUNICATIONS COMMISSION Washington, DC 20554

In the Matter of

Revisions to 47 CFR Part 90 rules for Public Safety RM- [TO BE ASSIGNED] Communications and Signal Boosters PETITION FOR RULEMAKING July 22, 2025 Safer Buildings Coalition John Foley, Managing Director Roseburg, OR 97470 Tel: (610) 291-3856 email: john.foley@saferbuildings.org Supersedes Submission IDs 1071895389395 and 107210863615884 Removed words "SBC Internal Confidential" and "DRAFT" from footer of original filing. Added Footnote on page 24 and updated subsequent footnote numbering Table of Contents A. Critical Problems Addressed B. Proposed Solution

Key Technical Arguments

- APCO survey and DHS/CISA studies document interference with public safety systems
- Boosters deployed where not needed, violating Part 90 rules
- Regulatory framework gaps from 2013 rulemaking
- Violations of ERP limits and network protection standards
- Campus properties need coordinated approach

APPENDIX II

APCO Survey Summary: Signal Booster Deployment, Noise and Interference

Survey conducted by APCO in 2024 with 41 valid responses from public safety radio system operators across the United States. This survey was distributed to a limited number of APCO members with known or presumed visibility to signal booster deployment in the U.S. Survey summary report reviewed and approved by APCO.

Executive Summary

The Association of Public-Safety Communications Officials (APCO) conducted a comprehensive survey in 2024 of public safety radio system operators regarding signal booster (BDA/ERRCS/ERCES) deployment, regulatory compliance, and interference issues. The survey collected 41 valid responses from across the United States, revealing significant challenges with signal booster implementations affecting public safety communications.

Key Findings

Signal Booster Deployment and Awareness

Signal Booster Installations: 78% of respondents (32 out of 41) reported that building owners or contractors have installed signal boosters in their service areas, indicating widespread deployment across jurisdictions.

Regulatory Awareness Gap: A concerning 56.1% of respondents (23 out of 41) reported that building owners and contractors are generally not aware of FCC requirements for BDA installations, with only 22% indicating awareness.

Compliance Issues: Nearly half (48.8%) of respondents are aware of instances where signal boosters have been installed without proper FCC certification or compliance with Part 90 rules, highlighting significant regulatory compliance problems.

Impact on Public Safety Systems

System Performance: The impact on public safety system performance varies:

- 29.3% reported worsened performance since BDA installations increased
- 17.1% reported unchanged performance
- 17.1% reported improved performance
- 36.6% were unsure of the impact

Noise and Interference: Signal booster interference is a significant problem:

53.7% experienced noise or interference from signal boosters affecting their radio systems

Safer Buildings Coalition FINAL FCC Signal Booster Petition July 22, 2025

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Main Requests - Authorization Framework

- Formal authorization procedures with published criteria
- Technical criteria documents and interference analysis requirements
- Define response timelines with expedited options
- Comprehensive documentation with unique IDs
- Expanded database with public search capability

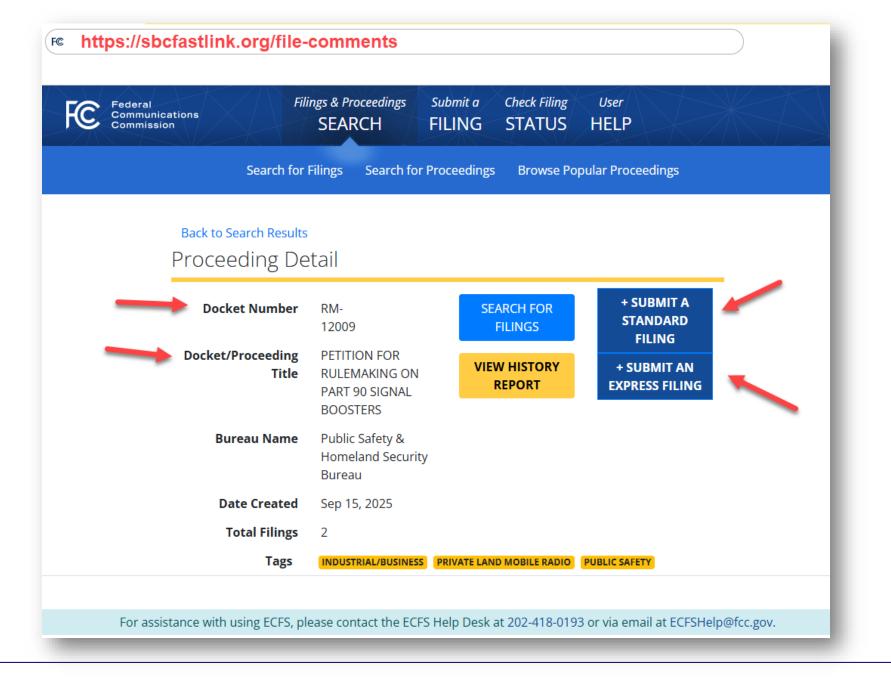
Request for Your Support

- File Comments: https://sbcfastlink.org/file-comments
 - Share technical expertise on interference issues
 - Leverage your operational experience in comments
 - Let others know what is at stake and encourage them to comment
- •Contact: John Foley, Managing Director | john.foley@saferbuildings.org | (610) 291-3856





File Comments



You can file **Standard Comments**

(with attached documents)

or

Express Comments

(place your text comments right on the filing form).



File Comments

https://sbcfastlink.org/file-comments