



LAND MOBILE COMMUNICATIONS COUNCIL

February 13, 2018

Ms. Rosemary C. Harold
Chief, Enforcement Bureau
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: Proliferation of Non-FCC Compliant Radio Devices

Dear Ms. Harold:

The Land Mobile Communications Council (LMCC) is a nonprofit association of organizations that represent the wireless communications interests of public safety, critical infrastructure, business, industrial, transportation, private carriers, and manufacturers of wireless communications equipment (see www.LMCC.org).¹ The purpose of this letter is to request a meeting with Enforcement Bureau management personnel for the purpose of identifying public relations, educational, enforcement and other potential activities that will serve to address the wide-spread use of non-rule compliant wireless devices, whose access, illegal use and distribution has reached epidemic proportions.

We suspect that the Enforcement Bureau is fully aware of this problem which has affected both Public Safety and Business/Industrial wireless sectors. Devices produced in Asia by multiple manufacturers² are often sold through the internet, including Amazon, as well as from retail outlets. The accompanying materials note, at most, that the devices have received FCC type-acceptance for use under Part 15 of the rules for amateur operations. In fact, the devices are marketed for use by any entity, for any purpose, complete with programming instructions for operation on any channel from 136-174 MHz and 400-520 MHz without regard or critical

¹ Member organizations include the American Association of State Highway and Transportation Officials, American Automobile Association, American Petroleum Institute, Association of American Railroads, Association of Public-Safety Communications Officials-International, Aviation Spectrum Resources, Energy Telecommunications and Electrical Association, Enterprise Wireless Alliance, Forest Industries Telecommunications, Forestry-Conservation Communications Association, International Association of Fire Chiefs, International Municipal Signal Association, MRFAC, Telecommunications Industry Association, The Monitoring Association, Utilities Telecom Council, and the Wireless Infrastructure Association.

² See TYT Electronics Company, Ltd (www.tyt888.com) and, QuanSheng Electronics Company, Ltd (www.QSFT.com).

information relating to Federal and non-Federal spectrum allocations, user eligibility or licensing requirements. This presents serious risk of harmful interference to Federal systems and FCC-compliant systems operated by Public Safety and Business/Industrial licensees. It also has significant economic consequences and creates competitive disadvantages that affect manufacturers and their partners who produce and distribute wireless products in full compliance with the Commission's and NTIA's operational and technical rules.

In advance of the meeting, we are prepared to provide information about improper deployments, product descriptions, FCC-certifications, testimonials, and other materials that will assist the Enforcement Bureau in addressing this urgent matter. The LMCC membership is also prepared to work collaboratively with the Enforcement Bureau, at its request, to help facilitate a meaningful resolution.

We look forward to hearing from you and, please feel free to contact the undersigned if you have any questions or comments.

Sincerely,

/s/ *Farokh Latif*

Farokh Latif
President

/s/ *Mark Crosby*

Mark Crosby
Secretary/Treasurer

cc via e-mail:
Aspasia Paroutsas, Chief, Spectrum Enforcement Division
Charles Cooper, Field Director
LMCC Membership