Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of	)	
	)	
Public Safety and Homeland Security	)	RM - 12009
Bureau and Wireless Telecommunications	)	
Bureau Seek Comment on Safer Buildings	)	
Coalition Petition for Rulemaking on	)	
Part 90 Signal Boosters	)	

COMMENTS OF APCO INTERNATIONAL

I. INTRODUCTION

The Association of Public-Safety Communications Officials, International (APCO)[1] offers these comments in response to the Public Safety and Homeland Security and Wireless Telecommunications Bureau's Public Notice seeking comment on the Safer Buildings Coalition's (SBC) Petition for Rulemaking on Part 90 signal boosters.[2] Signal boosters play a vital role in ensuring that public safety communications remain reliable in areas where radio signals would otherwise be blocked, including in-building, underground, and other challenging environments. However, the Commission's current rules governing industrial signal boosters, originally adopted in 2013,[3] would benefit from updates to address gaps that have contributed to inconsistent deployments, instances of harmful interference, and diminished confidence among

---

[1] Founded in 1935, APCO is the nation's oldest and largest organization of public safety communications professionals. APCO is a non-profit association with over 40,000 members, primarily consisting of state and local government employees who manage and operate public safety communications systems – including 9-1-1 emergency communications centers, emergency operations centers, radio networks, and information technology – for law enforcement, fire, emergency medical, and other public safety agencies.

[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, Public Notice, DA 25-83, (Sep. 16, 2025); *see also* Safer Buildings Coalition Petition for Rulemaking, RM-12009 (filed July 22, 2025) ("*SBC Petition*").

[3] *Amendments of Parts 1, 2, 22, 24, 27, 90 and 95 of the Commission's Rules to Improve Wireless Coverage Through the Use of Signal Boosters*, WT Docket No. 10-4, Report and Order, 28 Fed. Reg. 1663 (2013).

licensees. APCO therefore supports SBC's Petition and provides additional recommendations for a potential rulemaking to modernize Section 90.219 of the Commission's rules.[4]

II. DISCUSSION

As described in greater detail below, Commission action is needed to improve coordination between the signal booster installers, building owners, contractors, certified public safety frequency coordinators, fire and building code enforcement officials, and licensees to ensure the proper implementation of industrial signal boosters. APCO supports SBC's proposals and offers additional recommendations to expand upon them, such as adopting technical safeguards to prevent interference, establishing minimum training and competency standards for installers and vendors, and facilitating coordination with certified public safety frequency coordinators. APCO urges the Commission to initiate a rulemaking proceeding to revise its existing rules to ensure that building owners and their contractors have a clear understanding of applicable requirements, establish processes to increase licensee awareness when signal booster implementations occur in their jurisdictions, and ensure interference-free operations for public safety agencies.

A. APCO Supports Commission Action on the Proposals Raised in SBC's Petition for Rulemaking

APCO supports the establishment of a structured authorization framework for Part 90 signal boosters, as SBC recommends, that ensures Part 90 licensees are aware of where and when signal boosters are being implemented and have the clear opportunity to review and approve of any retransmission of their licensed frequencies prior to the deployment of the signal booster.[5] In addition, APCO supports complementary measures raised by SBC to support the

[4] *See* 47 C.F.R. § 90.219.

[5] *SBC Petition* at 11-17.

authorization framework, including expanding the existing signal booster database and enhancing device labeling requirements.[6]

The Commission's current requirement for "express consent" from spectrum licensees, set forth in Section 90.219, lacks the necessary procedural detail to ensure compliance and enforceability.[7] Without clear guidance on how consent is requested, documented, and tracked, licensees cannot effectively exercise control over their licensed spectrum, nor can regulators easily confirm that signal booster operations are lawful. Further, when signal boosters are improperly authorized, installed, or maintained, these devices can significantly disrupt public safety communications and may require extensive investigation and resources to resolve.[8] Findings from APCO's survey of public safety radio equipment operators, conducted in 2024 and referenced in SBC's Petition, further underscore the need for Commission action.[9] The survey identified widespread challenges with inconsistent signal booster deployments and interference incidents that have disrupted public safety radio communications.[10] These results reflect broad concern across the public safety community and reinforce the importance of updating the Commission's rules to support more reliable and interference-free operations. With

---

[6] *SBC Petition at 17.*

[7] *See* 47 C.F.R. § 90.219(b)(1)(i-ii) (requiring non-licensees seeking to operate signal boosters to seek express consent from licensees in a recordable format, but offering no specific guidelines on how consent is requested, granted, or tracked, and not requiring express consent from third-party licensees whose signals are incidentally retransmitted).

[8] For example, in 2022, the Washoe County Regional Communication System, in Washoe County, Nevada, encountered a persistent and disruptive source of radio frequency interference that could not be detected using conventional spectrum analyzers. Despite extensive local troubleshooting, the interference continued to impact critical communications systems. It ultimately required months of coordinated investigation and collaboration among APCO, the National Regional Planning Council, the Commission, and a specialized RF engineering team to pinpoint the root cause, which was identified as an improperly operating Bi-Directional Amplifier/Distributed Antenna System (BDA-DAS). *See* Melissa Lawney, Washoe County Regional Communications Coordinator, *Interference from BDA and DAS* (Aug. 2023), *available at* https://www.nrpc.us/documents/Interference_BDA_DAS_NRPCAugus2023.pdf.

[9] *See SBC Petition* at Appendix II (APCO Survey Summary: Signal Booster Deployment, Noise and Interference).

[10] *Id*.

a formal authorization framework, directly involving the Part 90 licensee, and clearer guidance to signal booster installers and operators, interference from these devices would be quicker to identify and easier to remedy as necessary.

APCO therefore supports SBC's proposal for the Commission to adopt a comprehensive authorization framework for industrial signal boosters, modeled after established frequency coordination processes under Part 90. Public safety communications depend on careful interference management, and frequency coordination has proven effective for decades in balancing the needs of multiple stakeholders while protecting incumbent licensees and supporting the continued development of mission critical communications systems. Applying similar attributes to a consent process for signal booster deployments would:

- Establish clear procedures for applicants to seek and document express consent from licensees;
- Provide licensees with transparency and confidence regarding how their spectrum is being reused in signal booster systems. For example, licensees could provide a 90-day "Conditional Approval" to retransmit licensed frequencies in support of a proposed in-building solution, with a "Final Approval" issued only after confirming that the solution does not cause interfere to the licensee's radio system; and
- Enable the Commission to verify compliance more efficiently, reducing disputes and enforcement burdens.

These measures would create a clear and consistent framework that safeguards licensees and streamlines the consent process.

In addition to a clear consent process, complementary measures are necessary to ensure the authorization framework is both effective and enforceable. Thus, APCO further supports SBC's proposals to (1) expand the existing signal booster database, by adding a registration requirement for Class A signal boosters, in addition to the current requirement for Class B signal boosters,[11] and (2) enhance the device labeling requirements for manufacturers. Expanding the database as SBC proposes will improve transparency, provide a more complete picture of deployed infrastructure, and facilitate quicker resolution of interference complaints. In addition, updated manufacturer labeling requirements will ensure installers and end users clearly understand the regulatory obligations associated with Part 90 signal booster equipment.

B. APCO Recommends Additional Considerations for a Rulemaking Proceeding on Part 90 Signal Boosters

In addition to supporting the rule changes proposed by SBC, APCO recommends additional proposals for the Commission to consider in a Notice of Proposed Rulemaking. In particular, APCO recommends the inclusion of technical safeguards, training and competency standards for vendors and installers, and coordination with certified public safety frequency coordinators.

1. Technical Safeguards

To complement a modernized consent process, APCO recommends that the Commission consider whether the existing technical safeguards and operational requirements applicable to consumer signal boosters should be extended to industrial signal boosters.[12] In particular, the Commission should evaluate how certain features such as self-monitoring and automatic shutdown capabilities could be extended to Part 90 signal boosters to further minimize the risk of harmful interference. Implementing these additional technical protections could allow devices to detect operational anomalies or unintended transmissions and automatically suspend operations

---

[11] *See* 47 C.F.R. § 90.129(d)(5) (requiring Class B signal booster installations to be registered in the Commission's signal booster database available at www.fcc.gov/signal-boosters/registration); *see also,* 47 C.F.R § 90.219(a) (defining Class A signal boosters as "designed to retransmit signals on one or more specific channels" and Class B signal boosters as "designed to retransmit any signals within a wide frequency band").

[12] *See, e.g.,* 47 C.F.R. § 20.21 (outlining operational requirements for consumer signal boosters including, among other things, self-monitoring, power down capabilities, and additional interference safeguards).

before interference occurs, providing an additional layer of protection for public safety communications. In conjunction with these capabilities, the Commission should seek comment on any additional best practices that could further promote consistent, interference-free operations.

2. Minimum Training and Competency Standards for Signal Booster Installers and Vendors

APCO recommends that the Commission explore minimum competency, training, and/or certification requirements for vendors and installers of industrial signal boosters. Incidents of interference often arise from poor system design, improper installation, or a combination of both, and these failures can have severe consequences for public safety communications. To address these risks, the Commission could establish minimum standards that would ensure personnel responsible for designing, installing, and maintaining these systems possess the technical expertise necessary to prevent harmful interference, comply with Commission rules, and implement industry best practices. By promoting a baseline level of knowledge and accountability, these requirements would help safeguard public safety communications and reduce the likelihood of operational failures that disrupt critical radio systems.

3. Coordination with Certified Public Safety Frequency Coordinators

In its Petition, SBC outlines a third-party participation framework utilizing certified Part 90 public safety frequency coordinators.[13] APCO supports this proposal and requests the Commission seek comment on how third-party resources could improve the efficiency and

[13] *SBC Petition* at 15.

effectiveness of the consent process. For example, these resources could enhance the process in the following ways:

- **Centralized Request Handling**: Applicants for new signal booster deployments could submit their consent requests through a certified public safety frequency coordinator. The coordinator would verify the technical parameters of the booster system (coverage area, power levels, filtering, class of device, etc.), ensuring the request is technically sound and consistent with FCC rules.
- **Licensee Notification and Consent Tracking**: Once submitted, the application could be automatically routed to both the certified public safety frequency coordinator and the licensee. The public safety frequency coordinator would work to verify the application is complete and formally notify the affected licensee(s) of the validity of the request, provide the technical details needed for informed review, and maintain a record of the licensee's decision after approval. This would ensure licensees retain ultimate control of their spectrum while benefiting from a structured process that avoids ad hoc or undocumented communications. Licensees could determine the parameters for the in-building booster implementation that best meet their needs.
- **Database Integration**: Public safety frequency coordinators could feed directly into the signal booster registration database managed by the Commission (through the electronic batch filing process), providing a single, accurate source of records for both Class A and Class B boosters. This would reduce duplication and make it easier for the Commission to verify that consent was properly obtained.

Together, these measures would provide a more structured, transparent, and efficient process for obtaining licensee consent while maintaining oversight and accountability.

Requiring coordination with certified public safety frequency coordinators would preserve the rights of spectrum licensees while providing a formal, traceable, and technically vetted process to support consistent oversight of signal booster deployment. A standardized process across jurisdictions would also prevent a patchwork of local procedures, simplify compliance for installers and building owners, and ensure all licensees receive equal protection.

III. CONCLUSION

APCO agrees with the concerns raised by SBC on the current regulatory framework and supports Commission action to address these issues. The public safety community requires reliable and interference-free communications inside buildings and other complex environments. A modernized Part 90 signal booster framework – anchored in structured authorization, expanded registration, and strengthened licensee oversight – will significantly advance this goal. For the foregoing reasons, APCO urges the Commission to initiate a rulemaking consistent with the SBC Petition and APCO's additional recommendations.

Respectfully submitted,

APCO INTERNATIONAL

By:

Mel Maier
CEO and Executive Director

Stephen Devine
Chief Technology Officer
(573) 616-0490
devines@apcointl.org

Alison Venable
Government Relations Senior Counsel
(571) 312-4400 ext. 7004
venablea@apcointl.org

November 18, 2025