Dear Ms. Dortch:

On June 30, 2015, the Wireless Internet Service Providers Association ("WISPA") submitted the attached letter in an ex parte presentation in ET Docket No. 13-49. The letter outlines a professional installation certification program that WISPA plans to establish.

In the above-referenced proceedings, the National Association of Broadcasters ("NAB") has suggested that the Commission amend its rules to eliminate the professional installation option for TV white space devices and devices in the Citizens Broadband Radio Service.\(^1\) NAB states that "mere tweaks to the rules regarding the definition of 'professional installation' are unlikely to address the fundamental problems." WISPA respectfully disagrees. Its program is intended to effectuate positive changes to the professional installation requirements that will ensure that professional installers meet rigid requirements that include an understanding of applicable FCC service rules.

The effectiveness of a professional installation certification program will benefit all spectrum users. To that end, WISPA invites stakeholders to work with WISPA to help develop an effective program that can apply in all spectrum bands. Please contact the undersigned for additional information.

\(^1\) See Letter from Rick Kaplan, General Counsel and Executive Vice President, National Association of Broadcasters, to Marlene H. Dortch, FCC Secretary, ET Docket No. 14-165 and GN Docket No. 12-354; RM-11745 (filed July 2, 2015).
Pursuant to Section 1.1206 of the Commission’s Rules, this letter is being filed electronically via the Electronic Comment Filing System in the above-captioned proceedings.

Respectfully submitted,

/s/ Alex Phillips  
Vice President and FCC Committee Chair  
(540) 908-3993  
alexp@highspeedlink.net

Enclosure

cc: Julius Knapp  
    John Leibovitz  
    Ira Keltz  
    Paul Powell
Date: June 17th, 2015

Julius Knapp, Chief
Office of Engineering and Technology
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Docket No. 13-49

Dear Mr. Knapp:

On behalf of the Wireless Internet Service Providers Association ("WISPA"), this is to inform you about WISPA's plans to develop a "Professional Installer" certification program within the next 3-6 months. This program is tentatively planned to be divided into four modules:

1. Components of a network
2. Tower installations (Mechanical, OSHA and NEC)
3. Home and Business installations (Best practices and NEC)
4. Regulatory

The first three modules will be specific to those aspects of installation work WISPA believes are important to ensure quality work in our industry. The fourth module will focus on regulatory matters to ensure compliance with applicable FCC regulations for unlicensed operations. This module will be made available to manufacturers of unlicensed products that have their own certification program as an add-on to what they currently offer. We will also encourage other manufacturers to direct their customers to WISPA's program if they do not have one of their own.

It is expected that installers that seek certification as professional installers be required to achieve a passing grade before they are issued a certificate and card. Certification will be for a three-year period and as new regulations are adopted, this new information will be incorporated into the program and provided to the previously-certified installers. WISPA plans to keep OET apprised of its progress as the certification program is being developed and to invite OET's input to ensure that the Commission's regulations are fully covered. In the meantime, please feel free to contact me if you have any questions.