



International Association of Fire Chiefs

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November 17, 2025

VIA ELECTRONIC FILING

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
45 L Street NE
Washington, DC 20554

RE: *Petition for Rulemaking for Part 90 Signal Boosters* [Docket No. RM-12009]

Dear Ms. Dortch:

On behalf of the nearly 11,000 members of the International Association of Fire Chiefs (IAFC), I thank the Federal Communications Commission (FCC) for the opportunity to submit comments to the Safer Building Coalition's (SBC) petition for part 90 signal boosters - *Petition for Rulemaking for Part 90 Signal Boosters* [Docket No. RM-12009]. We appreciate the opportunity to comment on this petition, and it is our desire that it will improve communications inside of buildings. Signal boosters help bridge the gap when there are lapses with radio communications, and they are essential for public safety communications.

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. For example, the Fairfax County Fire and Rescue Department in Fairfax VA, has experienced 60 instances of communications lapses during the last 10 years. Ten percent of these instances eliminated half of the available radio channels. Ninety percent of lapses eliminated groups of 1-4 channels, which caused audio issues for multiple first responders. To have engineers correct these problems, it was estimated that each instance took an entire day's worth of work.

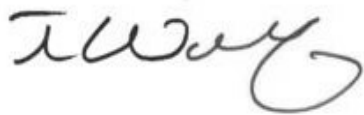
To further remedy this problem, Fairfax County Fire and Rescue spent about \$400,000 to invest in different forms of communications testing equipment. This investment includes handheld and fixed spectrum analyzers, along with a server system that records and automatically detects signal interference. Currently, signal booster system inspections are now part of their annual fire building inspections. That is an immense amount of time and money being wasted dealing with communications issues, when instead it could have been used to save a life.

The IAFC believes that the framework laid out by the SBC will lead to an increase in successful signal booster deployments. It will solve most of the present outstanding problems and it will give signal booster license holders and authorities having jurisdiction more defined guidelines. We firmly believe that the SBC part 90 signal booster framework will help to establish nationwide standards, which will make fire department approval processes more efficient. This will help signal booster integrators and manufacturers to create standardized products, training, and practices.

When it comes to turning off improperly deployed signal boosters, the IAFC believes it is prudent that it takes place in a responsible manner. A failing booster system can create harmful interference, not just to the facility but also an entire public safety radio system, potentially bringing it down completely. It will also most likely not serve its purpose to cover the facility if incorrectly installed or tuned. Therefore, turning it off is the safest solution. At the same time, it is important that a shutdown booster reports to a fire alarm control panel, so responders know which areas are impacted. Hopefully, by providing a framework for deployment, the FCC can reduce further interference from failing signal boosters.

The IAFC appreciates the SBC's petition for rulemaking for part 90 signal boosters. If public safety can communicate indoors without the threat of interference, it will immensely help with our lifesaving operations. Signal boosters must have a clear and defined way they can properly be deployed. We believe that the proposed framework can reduce interference and that improperly placed signal boosters should have responsible automatic shutdown capabilities. It has been over 10 years since the FCC updated Part 90 signal booster rules, and proper authorization framework is sorely needed.

Sincerely,

A handwritten signature in black ink, appearing to read 'Trisha L. Wolford', written in a cursive style.

Fire Chief Trisha L. Wolford MBA, MS, EFO, CFO, FM, NRP
IAFC President and Board Chair 2025 – 2026

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