



PUBLIC NOTICE

Federal Communications Commission
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DA 26-57

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**OFFICE OF ENGINEERING AND TECHNOLOGY SEEKS COMMENT ON
PIPER NETWORKS INC. REQUEST FOR WAIVER OF SECTIONS 15.519(A), 15.519(A)(2),
AND 15.519(C) OF THE COMMISSION'S RULES FOR ENHANCED TRANSIT LOCATION
SYSTEM**

ET Docket No. 19-246

Comment Date: February 16, 2026

Reply Comment Date: March 2, 2026

By this public notice, we seek comment on a request by Piper Networks, Inc. (Piper) to waive Sections 15.519(a), 15.519(a)(2), and 15.519(c) of the Commission's rules.¹ This waiver would allow Piper to obtain equipment authorization for its ultrawide band (UWB) train positioning system known as the Enhanced Transit Location System (ETLS) as fixed wireless infrastructure in the greater New York City, the greater Boston area, and Harris County, Texas.²

We previously granted Piper a waiver of Section 15.519(a), and 15.519(a)(2) of the Commission's rules to allow it to deploy its ETLS as fixed wireless infrastructure under the handheld UWB device rules, within the greater New York City area, and Harris County, Texas area using the 4243-4743 MHz frequency band.³ In 2025, Commission granted Piper's request to modify its original grant under the same waiver terms to include the metropolitan Boston, Massachusetts area to its area of operation.⁴ Piper now requests that its system be allowed to operate in the 3.248–4.990 GHz band in the same geographic areas where it is already authorized to operate, while transmitting 6 dB beyond the currently permitted limit of –41.3 dBm, resulting in a maximum EIRP of –35.3 dBm, under our rules for handheld UWB systems.⁵ Piper asserts that granting this request is in public interest, and allowing its system to operate at marginally higher power level with expanded bandwidth will not result in harmful interference to other operators.⁶

¹ Piper Networks Inc. Request for Waiver of Section 15.19(a), 15.519(a)(2), and 15.519(c) of the Commission's Rules, ET Docket No. 19-246. (Piper Waiver Request 2025)

² *Id.* at 1.

³ Piper Networks Inc. Request for Waiver of Section 15.519(a) and Section 15.519(a)(2) of the Commission's Rules, Order, ET Docket No. 19-246 (OET 2020), 35 FCC Rcd 12912 (2020 Waiver Order)

⁴ Piper Networks Inc. Request for Modification of Waiver of Section 15.519(a) and Section 15.519(a)(2) of the Commission's Rule, Order, ET Docket No. 19-246 (OET 2025), 40 FCC Rcd 344 (1) (OET 2025).

⁵ Piper Waiver Request 2025 at 1, 14. Seeking waivers of Section 15.519(a), 15.519(a)(2), and 15.519(c).

⁶ *Id.* at 2, 8.

Section 15.519(a) of the Commission's rules contains provisions for UWB devices that are relatively small, primarily handheld while being operated, and do not employ a fixed infrastructure.⁷ Section 15.519(a)(2) prohibits the use of antennas mounted on outdoor infrastructure.⁸ Piper argues that its ETLS devices are functionally equivalent to handheld UWB devices in size and operation. The system operates by establishing consecutive, short-duration peer-to-peer connections, rather than wide-area networks, thereby posing negligible interference potential to authorized services.⁹

Section 15.519(c) of the Commission's rules restricts radiated emissions in the 3100 – 10600 MHz band to -41.3 dBm.¹⁰ Piper seeks waiver of this rule to allow its system to exceed the limit by 6 dB, to produce an EIRP of no more than -35.3 dBm.¹¹ It states that higher limit would allow for the beneficial control of trains to protect public safety, without any additional risk of harmful interference to adjacent services.¹²

Piper states that its system would comply with all other UWB rules, employ directional antenna with narrow beamwidth to reduce emission, and be mounted low to the ground to minimize emissions outside the intended area.¹³ Piper also notes that its waiver is similar to previous waivers Commission has granted, and provides attestation that it has not received any of report of harmful interference stemming from its current operations.¹⁴

The Commission's Office of Engineering and Technology (OET) seeks comment on Piper's waiver modification request. Parties should file all comments and reply comments in ET Docket 19-246, which, for ex parte purposes, is designated as a "permit-but-disclose" proceeding in accordance with Section 1.1200(a) of the Commission's rules and is subject to the requirements under Section 1.1206(b)

Filing Requirements. Pursuant to sections 1.415 and 1.419 of the Commission's rules, 47 CFR §§ 1.415, 1.149, interested parties may file comments in ET Docket No. 19-246 on or before the date indicated on the first page of this document and should reference this public notice. Comments may be filed using the Commission's Electronic Comment Filing System (ECFS). *See Electronic Filing of Documents in Rulemaking Proceedings*, 63 FR 24121 (1998).

- Electronic Filers: Comments may be filed electronically using the Internet by accessing the ECFS: <https://apps.fcc.gov/ecfs/>
- Paper Filers: Parties who choose to file by paper must file an original and one copy of each filing.
 - Filings can be sent by hand or messenger delivery, by commercial courier, or by the U.S. Postal Service mail. All filings must be addressed to the Commission's Secretary, Office of the Secretary, Federal Communications Commission.

⁷ See 47 CFR § 15.519(a).

⁸ See 47 CFR § 15.519(a)(2).

⁹ Piper Waiver Request 2025 at 10-13.

¹⁰ See 47 CFR § 15.519(c).

¹¹ Piper Waiver Request 2025 at 14.

¹² *Id.* at 16.

¹³ *Id.* at 13.

¹⁴ Piper Waiver Request 2025 17-18, and Attachment A (Pg. 20).

- All hand-delivered or messenger-delivered paper filings for the Commission's Secretary are accepted between 8:00 a.m. and 4:00 p.m. by the FCC's mailing contractor at 9050 Junction Drive, Annapolis Junction, MD 20701. All hand deliveries must be held together with rubber bands or fasteners. Any envelopes and boxes must be disposed of before entering the building.
- Commercial courier deliveries (any deliveries not by the U.S. Postal Service) must be sent to 9050 Junction Drive, Annapolis Junction, MD 20701.
- Filings sent by U.S. Postal Service First-Class Mail, Priority Mail, and Priority Mail Express must be sent to 45 L St. NE, Washington, DC 20554.
- *People with Disabilities:* To request materials in accessible formats for people with disabilities (braille, large print, electronic files, audio format), send an e-mail to fcc504@fcc.gov or call the Consumer & Governmental Affairs Bureau at 202-418-2454 (voice), 202-418-0432 (tty).

Parties should also send a copy of their filings to Syed S. Hasan, Office of Engineering and Technology, Federal Communications Commission, 45 L Street, NE, Washington DC 20554, or by e-mail to Syed.Hasan@fcc.gov.

Documents associated with this docket will be available for public inspection through the Commission's ECFS.

By the Chief, Office of Engineering and Technology

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