September 8, 2026

The Honorable Brendan Carr
Chairman
Federal Communications Commission
45 L Street, NE
Washington, DC 20554

RE: ET Docket No. 21-232; Protecting Against National Security Threats to the Communications Supply Chain Through the Equipment Authorization Program

Dear Chairman Carr:

The undersigned organizations appreciate the opportunity to provide comments on the Federal Communications Commission's ("Commission" or "FCC") Third Further Notice of Proposed Rulemaking in *Protecting Against National Security Threats to the Communications Supply Chain Through the Equipment Authorization Program*, ET Docket No. 21-232.

Our organizations represent stakeholders throughout the U.S. business events industry, including the event organizers, exhibitors, venues, suppliers, and service providers that make exhibitions, conferences, conventions, tradeshows, and other business events possible. Every day, these events bring together buyers, sellers, innovators, researchers, entrepreneurs, and industry leaders from across the U.S. and around the world to discover new products, exchange knowledge, evaluate emerging technologies, establish business relationships, and drive innovation in communities nationwide.

We strongly support the Commission's efforts to protect the security and integrity of the nation's communications supply chain. Preventing equipment that poses an unacceptable national security risk from being unlawfully sold, deployed, or incorporated into U.S. communications networks is an important federal responsibility.

At the same time, we urge the Commission to preserve the longstanding, carefully circumscribed rules that permit radiofrequency devices that have not yet received equipment authorization to be imported, displayed, and operated temporarily for demonstrations at bona fide industry tradeshows and exhibitions.

Specifically, the Commission should:

1. Retain the tradeshow importation pathway currently provided by 47 C.F.R. § 2.1204(a)(4), including within any new framework applicable to covered equipment;

2. Preserve the ability to advertise and display unauthorized devices at tradeshows and exhibitions under 47 C.F.R. § 2.803(c)(2)(iii), rather than allowing the proposed

categorical marketing prohibition for covered equipment to inadvertently prohibit such displays; and

3. Retain the tradeshow demonstration provisions in 47 C.F.R. § 2.805 that allow the carefully controlled operation of devices prior to equipment authorization.

Taken together, these provisions create a limited and well-regulated pathway for demonstrating emerging technologies at industry events without allowing those devices to be sold, distributed to end users, or placed into general commercial operation in the U.S. Eliminating or materially restricting that pathway would impose significant costs on U.S. tradeshows, exhibitors, buyers, and the broader innovation ecosystem without a corresponding national security benefit.

I. U.S. tradeshows and exhibitions play a unique role in product development, evaluation, and innovation.

Tradeshows and exhibitions are not merely retail marketplaces. They are controlled business-to-business environments where manufacturers and technology developers demonstrate products, receive feedback, evaluate customer needs, meet potential partners, compare technologies, and educate professionals about emerging innovations.

The ability to demonstrate a product before it completes the FCC authorization process is particularly important for industries where product-development cycles move rapidly. Exhibition schedules are established months or years in advance, while product development, testing, and equipment authorization processes proceed on separate timelines. A technology company may have a prototype or pre-production product ready to demonstrate at an important industry event even though the device has not yet completed the Commission’s equipment authorization process.

That demonstration can serve several legitimate purposes. Potential customers may need to understand how a new technology works before providing the manufacturer with feedback. Engineers and product developers may use tradeshow interactions to identify interoperability or performance issues. Distributors and business partners may need to evaluate emerging technologies well before commercial availability. For international companies, a U.S. exhibition may bring together customers and stakeholders from dozens of countries, including markets in which a particular product may ultimately be lawfully sold even if it will not be eligible for commercial deployment in the U.S.

In each of these circumstances, displaying and demonstrating a product is fundamentally different from putting that product into the U.S. commerce stream or deploying it in a U.S. communications network.

If exhibitors cannot bring new and emerging technologies to U.S. events until every regulatory process is complete, companies may instead debut those technologies at events outside the U.S., including those taking place in China. As a result, U.S. businesses, engineers, buyers, entrepreneurs, and other stakeholders would lose opportunities to see and evaluate emerging products firsthand, while U.S. tradeshows would become less competitive as global venues for innovation and commerce.

The Commission should avoid that unintended result.

II. The Commission's existing tradeshow framework already contains meaningful safeguards.

The current rules do not provide an unrestricted exemption for unauthorized radio frequency (RF) equipment. To the contrary, the Commission has constructed a series of complementary safeguards governing importation, display, and operation.

First, § 2.1204(a)(4) allows unauthorized RF devices to be imported in limited quantities specifically for demonstration at industry tradeshows. The rule limits importation to 400 or fewer devices absent written approval from the Chief of the Office of Engineering and Technology and prohibits those devices from being offered for sale.

Second, § 2.803(c)(2)(iii) permits an unauthorized RF device to be advertised or displayed at a tradeshow or exhibition only when accompanied by a conspicuous notice informing attendees that the device has not been authorized by the FCC and may not be offered for sale or lease, sold, or leased until authorization is obtained.

Third, § 2.805 imposes separate conditions on the actual operation of an unauthorized device. Depending on the type of device and manner of operation, the rule requires compliance with applicable Commission rules, operation under appropriate licensing authority or at restricted power levels, appropriate notice, and retrieval or rendering the device inoperable at the conclusion of the permitted operation.

These are meaningful guardrails. They distinguish a temporary, controlled demonstration from unrestricted commercial availability.

More importantly, the Commission's own experience demonstrates that these safeguards work. When the FCC expanded the pre-authorization operation rules in 2013, it expressly recognized the unique characteristics of industry tradeshows. The Commission observed that tradeshow schedules and operating hours are known, that demonstrations generally take place in confined areas, and that tradeshows often have frequency coordinators who can help identify and quickly remedy interference. The Commission also noted that it had not received interference complaints under the existing tradeshow provisions. It concluded that allowing demonstrations under carefully prescribed conditions appropriately balanced the opportunity for manufacturers to demonstrate their new RF devices against the potential for harmful interference.[1]

The Commission reached a similar conclusion regarding importation in 2017. After observing that exhibitors had sought permission to bring more demonstration units to U.S. tradeshows than the existing limits allowed, the Commission increased the ordinary limit to 400 units. It determined that the revised threshold would accommodate legitimate tradeshow needs while "maintaining a check" on potential interference concerns.

Nothing in this proceeding demonstrates that the fundamental characteristics of trade-show demonstrations have changed or that these safeguards are no longer effective.

III. The proposed rules could unintentionally eliminate the entire pathway for legitimate tradeshow demonstrations.

The Third Further Notice raises this issue in several different sections, which makes it important that the Commission consider the rules together rather than in isolation.

Importation. Paragraph 166 specifically asks whether the § 2.1204(a)(4) exclusion permitting limited numbers of unauthorized devices to be imported for demonstration at industry tradeshows should be revised. At the same time, the Commission proposes a new § 2.1204(c) establishing the circumstances in which covered equipment could enter the U.S. As currently drafted, that proposed subsection contains exceptions for testing and evaluation, product development, export, U.S. Government use, and development of products for U.S. Government use, but it does not contain a tradeshow demonstration exception. The Commission should correct that omission.

It would be difficult to justify allowing a limited number of covered devices to enter the country for testing and product development while categorically prohibiting the same devices from entering temporarily for an equally controlled tradeshow demonstration. Both

[1] Promoting Expanded Opportunities for Radio Experimentation and Market Trials under Part 5 of the Commission's Rules*, Report and Order, FCC 13-15, ¶ 127 (2013).

activities involve limited quantities of equipment for defined purposes rather than general commercial sale or deployment.

Display. The Commission should also ensure that its proposed changes to § 2.803 do not eliminate the ability to display such equipment. Paragraphs 169 and 170 propose excluding unauthorized covered equipment from the pre-authorization marketing exceptions contained in § 2.803(c). But one of those exceptions is the longstanding provision in § 2.803(c)(2)(iii) that permits a device to be advertised or displayed at a tradeshow or exhibition when accompanied by the required notice.

A categorical prohibition on all § 2.803(c) activity for covered equipment therefore risks reaching well beyond sales or offers for sale. It could prohibit the simple display of an appropriately labeled device at an exhibition even where the exhibitor cannot and does not offer the device for sale in the U.S. The final rule should expressly preserve trade-show display under appropriate conditions.

Operation. Finally, paragraph 196 asks whether the existing § 2.805 exceptions permitting operation of unauthorized devices for tradeshow demonstrations should remain available for covered equipment. They should.

A working demonstration is often indispensable to understanding an RF product. A router, communications device, wireless component, uncrewed aircraft system, or other RF technology cannot necessarily be meaningfully evaluated by viewing an inert object sitting on a table. Demonstration allows attendees to understand functionality, performance, interoperability, and potential applications.

The current § 2.805 framework recognizes this reality while imposing technical and operational safeguards designed to prevent harmful interference. The Commission should retain that balance.

Importation without display is of limited value. Display without the ability to demonstrate functionality significantly diminishes the value of participation. And permission to operate a demonstration device is meaningless if the exhibitor cannot lawfully bring it into the country in the first place.

For that reason, the Commission should preserve the entire tradeshow pathway across §§ 2.1204, 2.803, and 2.805.

IV. Temporary tradeshow demonstrations do not present the same risk profile as commercial deployment.

The Commission's national security concerns understandably focus on preventing covered communications equipment from entering U.S. commercial networks, being sold to U.S. consumers, or otherwise creating persistent vulnerabilities.

A bona fide tradeshow demonstration presents a materially different circumstance.

Tradeshow devices are present for a limited time and purpose. They remain under the control of exhibitors. Existing rules can prohibit their sale or transfer. Their operation is limited and subject to FCC technical requirements. Attendees are expressly advised that the equipment has not received authorization and may not be commercially distributed. Following the event, the devices can be retrieved, rendered inoperable, exported, or otherwise handled in accordance with Commission requirements.

The Commission itself recognizes elsewhere in the Third Further Notice that national security objectives do not require a categorical prohibition on every entry of covered equipment into the U.S. The proposed § 2.1204(c), for example, would permit limited quantities of covered equipment to be imported for testing, evaluation, and product development and would permit equipment to enter for certain export and government purposes. The same risk-based approach should apply to tradeshows.

Moreover, the Commission should be particularly cautious about adopting a categorical prohibition as the Covered List evolves. The Third Further Notice recognizes that Covered List determinations increasingly may apply not only to equipment produced by specifically named companies, but also to entire categories of devices based on where they were produced. A blanket rule could therefore affect a much broader universe of products and exhibitors than rules focused exclusively on particularly identified manufacturers.

The more expansive the universe of covered equipment becomes, the more important it is for the Commission to distinguish between commercial deployment and temporary, controlled demonstration.

V. The Commission should preserve the existing tradeshow exceptions and use targeted safeguards if additional protection is necessary.

We therefore urge the Commission to retain the current tradeshow framework and expressly incorporate it into any new rules governing covered equipment.

Specifically, the Commission should:

- **Section 2.1204**: Add tradeshow demonstrations to the permissible conditions for importation of covered equipment under proposed § 2.1204(c), preserving the existing limited-quantity framework and the Commission's authority to approve additional units when warranted.

- **Section 2.803**: Modify proposed § 2.803(d)(3) so that its prohibition on marketing unauthorized covered equipment does not prohibit advertising or display at a bonafide tradeshow or exhibition consistent with the notice requirements currently contained in § 2.803(c)(2)(iii).

- **Section 2.805**: Preserve the existing exceptions permitting temporary operation for demonstrations at tradeshows and exhibitions, including their existing technical, notice, licensing, power-level, retrieval, and inoperability requirements.

If the Commission concludes that additional national security safeguards are warranted specifically for covered equipment, it should address those concerns through targeted conditions rather than eliminating the tradeshow pathway altogether. For example, the Commission could consider requirements concerning custody and control of demonstration units, documentation of the purpose of importation, prohibition of sale or transfer, and export, retrieval, destruction, or other appropriate disposition following the event.

Such safeguards would directly address the Commission's concern that a tradeshow exception could be used as a means of placing prohibited equipment into U.S. commerce while preserving legitimate temporary demonstrations.

In contrast, requiring every exhibitor to seek an experimental authorization or individualized agency approval for routine tradeshow demonstrations would create substantial uncertainty, delay, and administrative burden for exhibitors and the Commission alike. The existing categorical exception, coupled with clear safeguards and enforcement authority, is a more practical approach.

VI. Conclusion

The Commission can protect the nation's communications supply chain without closing America's tradeshow floors to emerging technologies.

For decades, the FCC's rules have recognized the legitimate need to import, display, and demonstrate unauthorized RF devices temporarily at industry tradeshows. Those rules contain meaningful safeguards, and the Commission's own experience has demonstrated that the controlled tradeshow environment allows new technologies to be demonstrated while protecting against harmful interference and unauthorized commercial distribution.

We respectfully urge the Commission to preserve that framework.

Specifically, the final rules should maintain a clear and workable pathway allowing limited quantities of equipment, including covered equipment, to be temporarily imported, appropriately displayed, and demonstrated at industry tradeshows and exhibitions, subject to reasonable safeguards preventing sale, transfer, commercial deployment, or other unauthorized use.

Doing so would advance the Commission's national security objectives while avoiding unnecessary harm to U.S. exhibitors, event organizers, buyers, innovators, and the broader U.S. business events industry.

We appreciate the Commission's consideration of these comments and would welcome the opportunity to provide additional information about the operation of tradeshows and exhibitions or to connect Commission staff with event organizers, exhibitors, venues, service providers, and other industry stakeholders who can explain the practical implications of these provisions.

Sincerely,