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. These events drive economic growth, support job creation, empower small businesses, and help solve our most urgent societal challenges. In addition, they drive demand for restaurants, hotels, travel services, and Main Street commerce nationwide. Our industry, which is comprised of more than 99% U.S. small businesses, employs 2.6 million Americans and will drive more than $400 billion in domestic spending this year.

At the outset, we respectfully ask the Commission to provide immediate public clarification that the Third Further Notice does not alter the FCC's existing tradeshow provisions while this rulemaking is pending. The need for that clarification is urgent.

ECA has heard anecdotally from tradeshow organizers that some shippers are already declining freight bound for U.S. tradeshows this fall because of uncertainty surrounding the Commission's action and the status of equipment that has not yet received FCC authorization. Whatever the Commission ultimately decides in this proceeding, that uncertainty is affecting near-term events now. We therefore urge the Commission to promptly and publicly confirm that §§ 2.1204(a)(4), 2.803(c)(2)(iii), and 2.805 remain in effect and may continue to be relied upon, according to their terms, for otherwise lawful tradeshow shipments, displays, and demonstrations until and unless the Commission adopts final rules changing them. Such clarification would give shippers, exhibitors, and organizers greater certainty and help ensure that lawful freight is not unnecessarily rejected for upcoming U.S. events.

Beyond that, 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 ("RF") devices that have not yet received equipment authorization to be imported, displayed, and operated temporarily for demonstrations at bona fide industry tradeshows and exhibitions.

For clarity, when these comments refer to "unauthorized" equipment, we use the term in the same technical sense as the Commission's equipment-authorization rules: equipment that has not yet received the required FCC authorization. "Unauthorized" does not mean "banned," and the undersigned are not asking the Commission to permit the importation, display, marketing, or operation of equipment where those activities are otherwise prohibited by law. Our request is to preserve the lawful, longstanding tradeshow pathway for pre-authorization equipment and to avoid changes that create uncertainty about otherwise permissible activity.

Specifically, the Commission should:

1. Immediately and publicly confirm that the existing tradeshow provisions in 47 C.F.R. §§ 2.1204(a)(4), 2.803(c)(2)(iii), and 2.805 remain in effect during the pendency of this rulemaking and may continue to be relied upon, according to their terms, for otherwise lawful shipments, displays, and demonstrations;

2. 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 to the extent such importation is otherwise lawful;

3. 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

4. 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 tradeshow 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. To the extent such importation is otherwise lawful, 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 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 covered equipment that lacks equipment authorization from the pre-authorization marketing exceptions contained in § 2.803(c). But one of those exceptions

[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).

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 tradeshow display under appropriate conditions where such display is otherwise lawful.

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, to the extent such operation is otherwise lawful under the Commission's rules.

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), to the extent such importation is otherwise lawful, 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 covered equipment that lacks equipment authorization does not prohibit advertising or display at a bona fide tradeshow or exhibition where such activity is otherwise lawful and consistent with the requirements currently contained in § 2.803(c)(2)(iii).

- **Section 2.805**: Preserve existing exceptions permitting otherwise lawful 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 equipment into U.S. commerce where such placement is prohibited 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 RF devices that have not yet received equipment authorization 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 the extent otherwise lawful, to be 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,

1. Access Intelligence
2. AFR Furniture Rental
3. All Show Services
4. AML Events
5. Apogee Exhibits
6. Aria AV
7. Association for Advancing Automation
8. Association of Equipment Manufacturers
9. Auto Care Association
10. AVIXA
11. Backtrack
12. Break Point Growth
13. Candr Talent
14. CEDIA | The Association for Smart Home Professionals
15. Clarion Events North America
16. Classic Exhibits
17. CloserStill Media
18. CNTV
19. Consumer Technology Association
20. ConvExx
21. CORT Events
22. CPR MultiMedia Solutions
23. CREW XP
24. CSI Worldwide
25. Cuil Bay Capital

26. Deckel & Moneypenny
27. Destination DC
28. Display Supply & Lighting
29. Easyfairs
30. embedded world North America
31. eMerge Americas
32. Emerald Carpets
33. Ernest N. Morial Convention Center
34. Event Marketing Authority
35. Events Education & Workforce Development Federation
36. Exhibition Services & Contractors Association
37. Exhibitions & Conferences Alliance
38. The Exhibitor Advocate
39. Exhibitus
40. Experiential Design Authority
41. Experiential Designers & Producers Association
42. Expo Convention Contractors
43. EXPOCAD
44. Exposition Development Company
45. Fast Forward Events
46. Forge
47. Freeman
48. GES
49. HERITAGE
50. International Association of Amusement Parks and Attractions
51. International Association of Exhibitions and Events
52. International Association of Venue Managers
53. International Congress and Convention Association
54. International Federation of Exhibition and Event Services
55. International Trade Information
56. JR Global Events
57. Laguna Displays
58. Las Vegas Convention and Visitors Authority
59. Lighthouse Exhibits
60. Lippman Connects
61. Live Events Coalition
62. Louisville Tourism
63. LVE
64. M Squared Dynamics
65. MAD Event Management
66. Manifest

67. Map Your Show
68. Metropolitan Pier and Exposition Authority
69. Modern Expo & Events
70. Modev Network
71. Momentive Software
72. National Association of Music Merchants
73. National Retail Federation
74. North American Veterinary Community
75. NoteAffect
76. NSSF | SHOT Show
77. NürnbergMesse North America
78. Nuvista
79. Orange County Convention Center
80. PCMA
81. ProExhibits
82. Promotional Products Association International
83. Quest Events
84. Raccoon Media Group
85. RX Global
86. Security Industry Association
87. Shepard Exposition Services
88. Snöball
89. Society of Independent Show Organizers
90. Strategic Consulting LLC
91. Strategic Meeting International
92. T3 Expo
93. Taffy Event Strategies
94. Take Success
95. The Iceberg
96. U.S. Travel Association
97. UFI, The Global Association of the Exhibition Industry
98. United Service Companies
99. Up/Link Summit
100. Xperiential Marketplace