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Via electronic filing

October 24, 2025

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

Re: *Promoting the Integrity and Security of Telecommunications Certification Bodies, Measurement Facilities, and the Equipment Authorization Program (ET Docket No. 24-136); Cybersecurity Labeling for Internet of Things (PS Docket No. 23-239); Wireless Telecommunications Bureau and Office of Engineering and Technology Seek Comment on NextNav Petition for Rulemaking (WT Docket No. 24-240; RM-11989)*

Dear Ms. Dortch:

On Wednesday, October 22, representatives of the Consumer Technology Association (CTA®) met with Federal Communications Commission (“Commission” or “FCC”) Chairman Brendan Carr and his Chief of Staff, Greg Watson. A full list of participants in the meeting is attached.

As North America’s largest technology trade association, CTA is the tech sector. Our members are the world’s leading innovators – from startups to global brands helping support more than 18 million American jobs. CTA owns and produces CES® – the most powerful tech event in the world. CTA is the trade association representing more than 1200 companies in the U.S. technology industry. Eighty percent of CTA companies are small and medium sized businesses and startups; others are among the world’s best-known brands. We provide members with policy advocacy, market research, technical education and standards development.

As illustrated by [CTA’s 2025 Innovation Agenda](#), CTA supports policy that encourages innovation, empowers consumers and encourages a competitive marketplace. We appreciate the opportunity to share our perspective on critical regulatory issues currently before the FCC.

Promoting National Security

CTA recognizes the importance of national security and the tech sector’s role in protecting critical infrastructure and consumers. We acknowledge the seriousness of the strategic challenge posed by

China and hear Chairman Carr's concerns. For decades, CTA CEO & Vice Chair Gary Shapiro has highlighted the potential negative impact of America's reliance on imported Chinese goods and inputs. In his 2024 book *Pivot or Die*, Shapiro says "We must reduce our vulnerability to sole reliance on China for strategic elements and products. We are battling China not only to be a world leader on innovation, investment, and economics, but also in our promotion of the values of democracy, human rights, and our way of life."¹

Maintaining the Integrity of the Equipment Authorization Program, While Mitigating the Impact from the Government Shutdown

CTA supports the FCC's commitment to maintaining the integrity of the Equipment Authorization Program. CTA, along with several other industry groups including AHAM, INCOMPAS, ITI, NEMA, and TIA, urges the Commission to take a measured approach that safeguards security while preserving innovation, consumer choice, and supply chain resilience.²

More, CTA shares Chairman Carr's concerns about the impact of the ongoing government shutdown on device certifications³ and looks forward to working with him to find a solution to benefit manufacturers and consumers.

Advancing the U.S. Cyber Trust Mark

CTA also supports efforts to protect critical infrastructure and consumers from cyber threats.⁴ CTA encourages industry driven standards, a light touch, voluntary approach, and continues to support the [U.S. Cyber Trust Mark](#) program as a vehicle to advance the Administration's national security goals.

Connectivity and Spectrum

CTA supports Chairman Carr's goals in the [Build America Agenda](#) and encourages continued investment in 5G and 6G infrastructure, broadband expansion and efficient use of licensed and unlicensed spectrum. To that end, we are pleased with the reinstatement of the FCC's spectrum auction authority. Making more spectrum available will benefit the U.S. economy and keep America on a path to continued innovation while protecting national security.

CTA supports finding complementary PNT solutions but continues to oppose NextNav's petition that would jeopardize the millions of unlicensed devices in the Lower 900 MHz Band.

¹ Shapiro, Gary. *Pivot or Die: How Leaders Thrive When Everything Changes*. William Morrow, 2024, at pg. 177.

² See generally Letter from AHAM, CTA, INCOMPAS, ITI, NEMA, TIA, ET Docket No. 24-136 (filed Sep. 11, 2025).

³ Carr warns of 'negative consequences' for FCC as shutdown rolls on, POLITICO (October 23, 2025).

⁴ See, e.g., J. David Grossman, *The U.S. Cyber Trust Mark: Empowering Consumers & Manufacturers for a More Secure America*, LinkedIn (Apr. 17, 2025), <https://www.linkedin.com/pulse/us-cyber-trust-markempowering-consumers-more-secure-america-zbo4e/>.

Pursuant to Section 1.1206 of the FCC's rules, this letter is being electronically filed with your office.⁵ Please contact the undersigned if you have any questions regarding this filing.

Respectfully submitted,

/s/ Rachel Nemeth

Rachel Nemeth
Senior Director, Regulatory Affairs

/s/ J. David Grossman

J. David Grossman
Vice President, Policy & Regulatory Affairs

cc: FCC Meeting Attendees (via email)

⁵ 47 C.F.R. § 1.1206.

Attendees

CTA

Gary Shapiro, CEO & Vice Chair

Kinsey Fabrizio, President

David Grossman, Vice President, Policy & Regulatory Affairs

Rachel Nemeth, Senior Director, Regulatory Affairs

FCC Office of Chairman Carr

Chairman Brendan Carr

Greg Watson, Chief of Staff