

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of	)	
	)	
Impinj, Inc.	)	File No. 0320-EX-CR-2026
	)	Call Sign WI2XJE
Application for Renewal of	)	
Experimental Authorization	)	

To: Chief, Office of Engineering and Technology
Attn: Experimental Licensing Branch

REQUEST FOR WAIVER OF SECTION 5.59(a)(2)

Impinj, Inc. (“Impinj”), by its undersigned counsel and pursuant to sections 1.3 and 5.65(c)(2) of the Commission’s rules, hereby requests waiver of section 5.59(a)(2) to the extent necessary to permit the Commission to accept and process Impinj’s pending application for renewal of experimental authorization WI2XJE (File No. 0320-EX-CR-2026, the “Renewal Application”), which was filed on April 21, 2026, 19 days after the 60-day pre-expiration filing deadline established by that rule. The current term of WI2XJE expires on June 1, 2026. As discussed below, good cause exists to grant the requested waiver, and grant will serve the public interest by enabling the Commission to consider the Renewal Application on its merits and avoiding an unwarranted disruption to Impinj’s ongoing program of radio frequency experimentation.

I. BACKGROUND

Impinj is the licensee of experimental authorization WI2XJE, a conventional experimental radio license issued under part 5 of the Commission’s rules. The purpose of Impinj’s experimental program under WI2XJE is to test and develop UHF RFID tag and reader equipment. The current term of WI2XJE is scheduled to expire on June 1, 2026.

Section 5.59(a)(2) provides that, “[u]nless otherwise directed by the Commission, each application for renewal of license shall be filed at least 60 days prior to the expiration date of the license to be renewed.” For WI2XJE, the applicable filing deadline was April 2, 2026. Impinj filed its Form 405 Renewal Application on April 21, 2026, 19 days after that deadline. The late filing was inadvertent and due to temporary calendaring and communication disruptions associated with recent personnel changes. Corrective steps, including updates to internal docketing controls, are being implemented to prevent recurrence.

Impinj otherwise complied with all applicable requirements of part 5 in preparing and submitting the Renewal Application, which is currently pending before the Commission.

II. THE COMMISSION SHOULD WAIVE SECTION 5.59(a)(2) FOR GOOD CAUSE.

Section 1.3 of the Commission’s rules provides that “[a]ny provision of the rules may be waived by the Commission on its own motion or on petition if good cause therefor is shown.”¹ Good cause is established where (i) special circumstances warrant deviation from the general rule, and (ii) such deviation will serve the public interest.² Both conditions are satisfied here.

First, the circumstances warrant deviation from the 60-day deadline. The filing was 19 days late, a short and discrete delay; the Renewal Application itself was filed 40 days before expiration, leaving meaningful runway for staff to review and act on the application before the current license term ends. As explained above, the late filing was an inadvertent side effect of personnel changes, entirely devoid of bad faith, and corrective measures are underway. Impinj

¹ 47 CFR § 1.3.

² *Northeast Cellular Tel. Co. v. FCC*, 897 F.2d 1164, 1166 (D.C. Cir. 1990); *see also WAIT Radio v. FCC*, 418 F.2d 1153, 1157-59 (D.C. Cir. 1969) (waiver appropriate where special circumstances warrant deviation from the rule and such deviation would serve the public interest more effectively than rigid adherence).

has not previously sought waiver of the 60-day deadline, and the Renewal Application proposes no substantive changes to the underlying authorization.

Second, grant of the waiver will serve the public interest. The Commission's stated purpose for part 5 is to facilitate experimentation and innovation in radio technology product development and market trials. 47 CFR § 5.1(b). Allowing Impinj's experimental program to continue without interruption squarely serves this purpose, as it would facilitate innovative development of new and improved UHF RFID tag and reader products. Denying the waiver and dismissing the Renewal Application as defective would create an unnecessary gap in authorization and force Impinj to refile under part 5 from scratch, an outcome disproportionate to a brief and curable filing delay.

Third, grant of the waiver will not frustrate the underlying purpose of section 5.59(a)(2). The 60-day deadline ensures that staff have adequate time to review renewal applications before the current license term expires. As of the date of this Request, 10 days remain before the June 1, 2026 expiration—sufficient time, with expedited processing, for the Commission to consider and act on the Renewal Application before the current term ends. The purpose of the rule is therefore preserved even with the modest delay at issue here.

Finally, Impinj respectfully requests that, if the waiver is granted, the Commission deem the Renewal Application timely filed for purposes of section 1.62 of the Commission's rules, so that operations under WI2XJE may continue pending Commission action on the Renewal Application.

III. CONCLUSION

For the foregoing reasons, Impinj respectfully requests that the Commission waive section 5.59(a)(2) and accept the Renewal Application for File No. 0320-EX-CR-2026 (Call Sign WI2XJE) as timely filed.

Respectfully submitted,

IMPINJ, INC.

/s/ Tony Lee

Fletcher, Heald & Hildreth, PLC
1300 N. 17th Street, Suite 1100
Arlington, VA 22209
Tel: 703.812.0442
lee@fhhlaw.com

Counsel to Impinj, Inc.

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