Grant Certificate Notes and Conditions
551693 DR01 Draft Publication

Office of Engineering and Technology
Laboratory Division
551693 DR01 Draft Publication

551693 DR01 updates and replaces the preceding 821551 DR01 (Nov. 2011)

551693 DR01 review draft to be published by early May 2015

Key features / scope:

- Provide guidance for consistent use of grant notes
- Grant notes purpose, background, concepts
- Recap KDB 447498 standalone and simultaneous transmission device approvals framework and permissive changes
- Distances for mobile and portable RF exposure
- Update system note codes numbering and content
Basic Concepts

Notes, conditions, and remarks on a grant of certification are only a summary of any special conditions that need specific notice.

The exhibits filed with an application for certification must provide a clear description of scope and allowed uses for a device as well as demonstrate compliance through representations including:

- Test data
- Installation/operating instructions
- Detailed operational description
Basic Concepts

- Conditions and notes listed on grants do not replace proper conformity with TCB review and approval procedures and policies.

- Compliance must be addressed for intended and reasonably expected operating configurations without relying on grant conditions and notes.
  
  - Example: WLAN and WWAN modules intended for use in laptop computers should contain RF exposure measurements and/or test exclusion analyses and installation instructions to avoid collocation and mobile-device grant restrictions conditions.
“No-collocation” grant condition (syns: colocation, co-location) has been used while technologies, policies, and procedures continue to evolve since start of TCB program

No-collocation condition has been used for:
- Single module devices
- Stand-alone single-transmitter equipment
- Specific-combination (composite system) multi-transmitter and multi-module end products

No-collocation condition present on grants may be too restrictive in instances where test exclusions may have been applied (with supporting info. in filing)

Absence of no-collocation condition on grant does not always mean device end use in simultaneous transmission multi-radio product configurations is authorized
Single-, Multi-radio Operations

No-collocation condition indicates:

- Additional compliance info may be needed to support device use in some multi-transmitter simultaneous transmission configurations within a single end product
- Representations and test data for only stand-alone single transmitter operations are in the FCC ID record

Real purpose of no-collocation condition

- Not to restrict device usage options
- Instead is to require compliance of multi-radio simultaneous transmission operations within a single end product
  - In cases where that is not already evaluated in the applications, or
  - For use outside parameters/scope for which the device was already evaluated
Single-, Multi-radio Framework

For most or all mobile and portable devices† the application filing framework described in KDB 447498 should be used:

- Stand-alone and simultaneous transmission use conditions for mobile and portable RF exposure conditions are established per intended host platform and product operating configuration requirements
- Transmitters approved only for use in stand-alone operations cannot be used in some simultaneous transmission operations without further evaluation
  - Further evaluation using test exclusion provisions or specific configurations approval

† § 2.1091 mobile device; § 2.1093 portable device
Single-, Multi-radio Framework

Transmitters and modules must be approved for host platform RF exposure conditions (per KDB 447498)

- In terms of product configurations tested or evaluated for subsequent host product use
  - Mobile-device exposure host platform
  - Portable-device exposure host platform
  - Mixed mobile-device and portable-device exposure host platform

Approved host platform exposure condition(s) must be identified on grants
Example Grant Condition

Previous TCB conference notes showed:
- The antenna(s) used for this transmitter must not transmit simultaneously with any other antenna or transmitter, except in accordance with FCC multi-transmitter product procedures
  - Multi-transmitter product procedures include 662911, 447498

The preceding must be used with:
- **Grantee must provide installation and operating instructions for complying with FCC multi-transmitter product procedures**

The preceding grant condition pair applies when:
- A device is intended and/or reasonably expected to operate with simultaneous transmission in a multi-radio end product
- Grantee provides installation instructions on how to address compliance issues
  - As supported by test data and/or test exclusion provisions for host platform configurations
Distances for Mobile, Portable

- 20 cm mobile-device exposure grant condition
  - Introduced and used for first generation of TCB approval procedures
  - Before TCBs were doing SAR reviews
  - Simply identifies that device compliance is addressed for MPE limit not SAR limit

As TCB review and approval policies and procedures have evolved
  - 20 cm condition no longer strictly necessary or appropriate
  - Use KDB 447498 grant listings framework
  - Similarly, distances not listed for portables

KDB Pub. 690793 (SAR listings) will be reviewed and updated as appropriate
Looking Forward

- Modular approvals and overall multi-radio considerations are discussed in other FCC sessions of this TCB workshop.

- Further details and approaches for permissive changes and new filings will be given in the upcoming 551693 DR01.

- TCBs are requested please to defer submitting KDBs concerning candidate grant condition changes until the 551693 DR01 review draft is published.