Equipment Authorization
Administrative Issues

TCB Workshop
October 2014

Laboratory Division
Office of Engineering and Technology
Federal Communications Commission
Topics

- PBA List and Procedures
- General Administrative Items
- KDB Updated and Expired Publications
Permit But Ask List Updates

- No modifications to PBA list
  - Review of PBA items is ongoing
Move to three classes of PBAs appears to be working well

- Devices subject to FCC review prior to approval by a TCB appear to cause some confusion.
  - This category is for cases where there is insufficient guidance for TCB to evaluate compliance.
  - FCC must provide test/review procedures prior to PBA submittal
  - This does not obviate PBA. PBA must still be submitted to ensure that guidance is followed.

- PBA sample requests
  - It is the responsibility of the applicant to provide all hardware necessary to complete testing.
  - Often samples are missing cables, software, or other essential materials.
  - This can lead to significant delays in the PBA approval.
TCB Permit But Ask Procedure

- Major Concern over TCB circumventing PBA procedures
  - Several cases of TCBs removing KDB number from applications and proceeding with before PBA review is complete.
  - Gross misconduct.
  - FCC takes this very seriously and will take appropriate action.
  - Current Equipment Authorization NPRM proposes to increase the Commission’s ability to take punitive action against TCBs for such cases

- As FCC transitions away from granting authorizations targeted audit will increase significantly
  - PBA items will be a primary focus of audits
Further Administrative Items

**Dismissal Request Letters**
- Letters must be signed by the applicant or applicant’s representative
- Must state that the device has not been sold or marketed anywhere with an FCC ID.

**Supersede Requests**
- Requests to supersede technical exhibits should be accompanied by an explanation of the request and a detailed description of the difference between the original and replacement exhibits.

**Short-Term Confidentiality**
- Short-term confidentiality expires once marketing of device commences
- It is the responsibility of applicant and the TCB to coordinate expiration of short-term confidentiality at the appropriate time.
Operational Description Exhibits

- Part 15 and 18 applications require a statement describing how the device operates.

- Applications for software defined radios and U-NII devices in the 5.15-5.35 GHz and the 5.47-5.85 GHz bands must include a **high level** operational description of the control software and security procedures, respectively.

- Most operational description exhibits are not adequate.
  - Sufficient detail must be provided to clearly explain device operation.
  - The high level operational description must be complete and thoroughly explain the control software and/or security procedures.

- We will be emphasizing increased scrutiny of Operational Description Exhibits during application audits.
Further Administrative Items

User’s Manual Exhibits

– Applications are expected to include the final user’s manual that is supplied with the device.

– Draft copies of manuals must be superseded and replaced with final version.

– Applications for devices that require professional installation must include an installer’s manual with clear, detailed, instructions on the operating and installation requirements.

– Grant comments must note professional installation requirement and identify any related limitations on the grant.
Reminders from TCB Conference calls

- Height restriction in Rule Section 27.50(d)(4) must be reflected on grants.
  - Fixed stations operating in the 1710-1755 MHz band are limited to a maximum antenna height of 10 meters above ground.
- Devices claiming SAR exemption based upon KDB guidance must include exhibit justifying exemption
- TCBs are responsible for resolving non-compliances of grants that they issued. Grantee and TCB must actively work together to come to a resolution.
KDB Updated and Expired Publications
Updated Publications

TCB Procedure

388624  Section 2.962, TCB Procedure, Permit But Ask

RF Exposure

357746  Radio Frequency Exposure - MPE; SAR
447498  Mobile and Portable Device, RF Exposure, Equipment
617965  Part 95 MedRadio, Human Torso Simulator, Tissue-
941225  SAR Test Procedures, 3G Devices, 2.5G,
248227  802.11, SAR, Sections 2.1093, 15.247, 15E, 90Y
Updated Publications

UNII

178919  Section 2.1043, Permissive Changes
442812  2.944, Software Defined Radio Application Guide
443999  15E, Dynamic Frequency Selection, DFS, DFS Approval
594280  Section 15.202 Software Configuration Control, Country Code
594340  Part 15E. Section 15.407, FCC 06-96, DFS, Special Operational
644545  15.247, 15.407, IEEE Std 802.11ac
789033  Part 15, Subpart E, Test Procedures
848637  UNII Client Device without Radar Detection, DFS Test Report,
905462  Section 15.401 UNII / DFS Test Procedures
926956  Permissive changes to UNII devices
Updated Publications

**e-labeling**

784748  Part 15, Part 18, Labeling Guidelines, Labeling, Information

**Signal Booster**

935210  20.21; 90.219; 22; 24; 27; 90; signal booster; amplifier

**Administration**

204515  Grantee Code, Modification and Transfer of Control

980285  OET Fee Schedule; Section 1.103; Equipment Authorization Fee

249634  Change in identification of equipment. §2.933 (New)

**General**

634817  2.102, Frequency Range, Certification

890966  Level Probing Radar, LPR, Tank Level Probing Radar, TLPR

937606  Test Site Requirements for Part 15 and 18 Devices < 30 MHz

971168  Measurement fundamental licensed devices with bandwidths > 1 MHz
RF Exposure

523966  Radio Frequency (RF) Exposure SAR
857364  Cellular/PCS Handset SAR, RF Exposure
767150  RF exposure for Bluetooth Modules, Personal Digital Assistant
759878  What are the health risks from a fixed site radio frequency
741229  RF exposure, SAR, fire fighting service camera, changing antenna
628258  RF exposure of transmitters in laptops Local Area Network, LAN
214295  Specific Absorption Ratio (SAR) for Devices That Hang from the UNII
898477  Unlicensed National Information Infrastructure (UNII) rules for Administration

Administrative

925609  Transfer of control, change of manufacturer
310200  Application Status [Administrative Procedure]

General

141765  Miscellaneous Wireless Communication Radio Services, emission
230398  Spread Spectrum, Part 15 DSS Repeater
260953  Shielding requirement for modular device
331361  Certification for a licensed transmitter
133857  Section 15.204, Amplifier, Antennas, Repeater
625728  Stand Alone Module; shielding; Part
351887  Source-based time averaging as applied to duty factor
Pending Draft of 551693 D01 Comments and Notes on Grants v01

- Goal of producing clear guidance on when and what grant notes are needed for specific applications and use conditions
- Consolidation of common grant comments to be replaced with preformed grant notes
  - Grant notes organized by general and specific categories i.e. output power, antenna installation, U-NII
  - Minimize the need for TCBs to use freeform grant comments
  - Include examples of how notes and comments are applied in a “building block” approach
Questions and Answers

Thanks!
Further Administrative Topics

- Confidentiality
- Grantee Code changes
- Fee filing guide updates
- Website update
- TCB roles and responsibility updates
- 17065 Transition
Confidentiality KDB

KDB 726920
- Last updated 12/3/2012
- Recent update 10/16/2014
  - Reorganized content
    - Created section for exceptional circumstances:
      » Reinstate recently expired STC
      » Making currently public info confidential
        » Formerly called post grant confidentiality
      » Third party confidentiality
  - Combined 4 attachments into 1 to remove repetitive info in attachments
Grantee Code KDB

KDB 204515

- Last update 8/12/2014
  - Modified lost grantee code procedures
    - Information required to obtain GC#
  - Combined transfer of control and grantee address change KDB publications
- Recent update 10/17/2014
  - Clarify that grantee Transfer of Control filing are for when all grantees are transferred to new entity.
  - Partial transfer of controls are submitted as Change in FCCID filings.
    - New change in ID KDB 249634
KDB 980285

- Last Update 10/14/2014

  - Fees change effective July 3, 2014
    - Grantee code fee $65
  - Only the amounts due changed and not any other requirements
Website Updates

Overall FCC Site
- Move from transition.fcc.gov to www.fcc.gov
- OET website content review and validation
- Text box data entry security validity checks

Equipment Authorization Sites
- KDB major guidance page lists all KDBs
- 13.56Mhz/2.4GHz DXX Scope A1/A2 issue resolved
- KDB search engine replaced 9/25/14
  • Same content searched but better indexing
  • Results found in attachment direct user to Q/A
- KDB file upload page now clarifies confidentiality
- KDB IE10/11 file upload issue resolved
TCB Roles and Responsibility

KDB 641163

- Last update 4/4/2014

  • Added references to ISO/IEC 17065
  • Modified key employee guidance
  • Updated standards references
    - ANSI C63.19
    - TIA-968-A
  • Updated guidance on contract employees, external resources and outsourcing
  • Modified guidance on acceptance of test reports
  • Modified guidance on evaluation, review and decision on certification
TCB Roles and Responsibility
KDB (cont)

Next update pending adoption of FCC 13-19 rule changes

- Updates under consideration
  - Combine core testing requirement sections
  - Update standards versions
    - C63.17 2006 to 2014
  - Reduce number of designated scopes
  - Requirements for reviewers and decision makers
  - Requirements for Impartiality
  - Clarify use of non-accredited test labs

- Draft publication is under consideration
ISO/IEC 17065 Transition

- ISO/IEC transition date September 15, 2015
- FCC rules currently specify compliance with ISO/IEC Guide 65
- FCC policy allows compliance with Guide 65 or 17065
- FCC NPRM 13-19 proposed updates to standards
  - Report and Order (R&O) based on FCC 13-19 proposals and comments on circulation with FCC Commissioners
  - Multiple KDBs will need to be updated if R&O adopted
- Working with MRA partners to ensure a consistent transition and update agreements as needed

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Questions and Answers

Thanks!