



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



TCB Permit But Ask Procedure

- 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.



Further Administrative Items

● 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 increase 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



Further Administrative Items

● 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



Expired

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



KDB Publication Updates

- 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



Fee Filing Guide KDB

- KDB 980285
 - Last Update 10/14/2014
 - <https://apps.fcc.gov/oetcf/kdb/forms/FTSSearchResultPage.cfm?switch=P&id=41712>
 - 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

● 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



Questions and Answers

Thanks!