



Review of FCC Equipment Authorization Program

Office of Engineering and Technology
Laboratory Division

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Review of Equipment Authorization Program

Presented at June 2012 Commission Meeting

- **First NPRM – TCB Obligations**
 - Consider:
 - Refine & codify PBA procedure
 - Clarify TCB obligations for post-grant checks
 - Require accreditation for all test labs
 - Recognize latest industry testing standards

- **Second NPRM – Administrative Procedures**
 - Consider:
 - Merge different self-approval procedures
 - Modify permissive change and Software Defined Radio rules
 - Certify modular transmitters for licensed services



Part 1

Equipment Authorization Order

- Equipment Authorization Report and Order
 - ET Docket No. 13-44, RM-11652
 - NPRM Released: February 15, 2013
 - R&O FCC 14-208 Adopted: December 17, 2014 and released: December 30, 2014
 - Effective Date: July 13, 2016
 - Some transition periods are defined in the Order
- Major topics covered by the Order:
 - TCB Program
 - Test Laboratories
 - Transition Period
 - Site Validation
 - Measurement Procedures



Transition Periods

- Order become effective July 13, 2015
- After July 12, 2015:
 - Form 731 requests for FCC equipment authorization applications may no longer be submitted to FCC
 - Requests for “2.948 Listing” of test laboratories no longer accepted by FCC
- On or after July 13, 2016
 - All recognized 2.948 listed test firms expired
 - Require use of C63.4-2014 and C63.10-2013
- October 12, 2016
 - Stop accepting test reports from “2.948 listed” for devices tested before July 13, 2016
- October 13, 2018
 - Require test firms to meet new site validation requirements for radiated emissions above 1 GHz



Petition for Reconsideration

- Petitions for Reconsideration/Clarification
 - Telecommunications Industry Association (TIA)
 - Motorola Solutions
 - Public Notice, October 22, 2015 – comments and reply comments to petitions
- Similar petitions for clarification and reconsideration on the Equipment Authorization Order
 - Clarify the procedures for the recognition of accreditation bodies that can accredit testing laboratories in non-MRA countries
 - Provide two years rather than one year as a transition period for currently non-accredited testing laboratories to complete the process



KDB Publications

- FCC is updating multiple KDBs impacted by order
- Review of KDB Publications
 - On-going review of all KDB publications
 - Changes resulting from Equipment Authorization Order
 - Developing Index of KDB Publications
- Draft publication
 - 641163 D01 TCB Roles and Responsibilities



KDB Publications

- Recent KDB Publications
 - 249634 Change in FCC ID
 - 388624 Pre-Approval Guidance
 - 996369 Modules
- RF Exposure – updates due to terminology changes in EA Order



Part 2

Equipment Authorization NPRM

- On July 21, 2015 the Federal Communications Commission (FCC) released a Notice of Proposed Rulemaking (NPRM) to update the rules that govern the evaluation and approval of radiofrequency (RF) devices.
- Comments due October 9, 2015.
- Reply Comments are due November 9, 2015.
 - See FCC 15-92, Amendment of Parts 0, 1, 2, 15 and 18 of the Commission's Rules regarding Authorization of Radiofrequency Equipment and Request for the Allowance of Optional Electronic Labeling for Wireless Devices, ET Docket No. 15-170, RM-11673, *Notice of Proposed Rulemaking* (released July 21, 2015).



Supplier's Declaration of Conformity

- Combine two separate product approval programs – Declaration of Conformity and verification – into one product self-approval program:
 - Verification and DoC are used for equipment that has a strong record of compliance and for which there is minimal risk of harmful interference
 - Documentation
 - FCC Logo
 - Labeling of products
 - Test Laboratory qualifications and use of an accredited laboratory



Modular Transmitters

- Codify and clarify the provisions for certification of modular transmitters – including those in products used for our licensed radio services – and for radios where the RF parameters are controlled by software
 - Section 15.212 specifies eight requirements for modular transmitter approval
 - Incorporate the Part 15 rules and KDB guidance for limited modular approvals into our revised Part 2 rule
 - RF exposure rules apply to all devices
 - Eliminate modular transmitters that are “split” into the “radio front end” (the radio elements) and the “transmitter control element” (the hardware on which the software that controls the radio operation resides)



Responsible Party

- Clarify responsibilities for compliance when a final product may be comprised of one or more certified modular transmitters
 - Certified modular transmitter installed – no certification application required.
 - Certified modular transmitter installed – additional certification application(s) required
 - Modification of certified equipment by third-party
 - Repaired and refurbished devices
 - Imported equipment



Confidentiality

- Codify existing practices that protect the confidentiality of market-sensitive information
- Short-term confidentiality.
 - Short-term confidentiality upon the applicant's request for 45 days, which may be extended with serial requests to a maximum of 180 days.
 - Immediately end such short-term confidentiality period if the device is marketed to the public or otherwise publicized by the applicant or by an entity acting on the applicant's behalf prior to the expiration of this period.
 - Short-term confidentiality automatically granted for some or all exhibits without being specifically requested by the applicant.
- Long-term confidentiality
 - Propose to automatically and indefinitely withhold from public inspection application the following types of exhibits: (1) schematics, (2) block diagrams, (3) operational descriptions, and (4) parts list / tune-up information.



E-Label

- E-LABEL Act requires the Commission, by August 26, 2015
 - “To promulgate regulations or take other appropriate action, as necessary, to allow manufacturers of radiofrequency devices with display the option to use electronic labeling for the equipment in place of affixing physical labels to the equipment.”
- OET has provided guidance regarding when and how a device’s electronic display may be used to convey certain required label information.
 - KDB Publication 784748 allows for the electronic display of the FCC ID, the FCC logo currently required under the DoC procedures, and/or any other information that is required by our equipment authorization rules to be provided on the surface of the product.
- The NPRM proposal will allow any radiofrequency device equipped with an integrated electronic display screen to display on the electronic display the FCC Identifier, any warning statements, or other information that the Commission’s rules would otherwise require to be shown on a physical label attached to the device.
- The proposed rules would not change the requirements to place warning statements or other information on device packaging or in user manuals or make information available at the point of sale.



Measurement Procedures

- Eliminate unnecessary or duplicative rules and consolidate rules from various specific rule parts into the equipment authorization rules in Part 2
- Draft ANSI C63.26
 - measurement procedures for compliance testing of transmitters used in licensed radio services



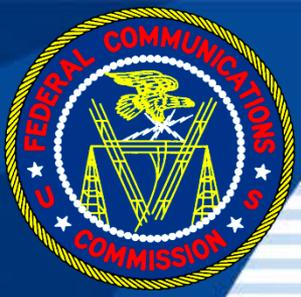
Importation

- Discontinue the requirement that importers file FCC Form 740 with Customs and Border Protection for RF devices that are imported into the United States.
- Modification of Customs bonded warehouse requirement
- Increasing the number of trade show devices
- Excluded devices
- Devices imported for personal use



Summary

- Order Implementation
 - Continuing to update KDB publications
 - Considering Petitions for Reconsideration and Clarification
- Notice of Proposed Rulemaking
 - This presentation is a summary of some of the topics being proposed – see docket for detailed information
 - Comments due October 9, 2015
 - Reply Comments are due November 9, 2015



Equipment Authorization System Upgrades



Scopes for 17025 Labs

- FCC 14-208 requires FCC recognize scopes for accredited test firms
- Initial scopes identified in KDB 974614
 - Next release of 974614 will merge Table 1 (DoC) and Table 2 (Certification)
- Electronic Filing System modifications to manage and maintain scopes for test labs are being internally tested now
 - Expected to become public before end of year
- Update scopes for ~370 currently recognized
- TCB's that accept test reports responsible for verifying that test lab has appropriate scope
 - Checks not currently automated in FCC system
- TCB labs will need their scopes updated
 - Updates completed through designating authority



Scopes for 17025 Labs

Scope	Test Method(s)
Part 15, Unintentional Radiators	<ul style="list-style-type: none"> ANSI C63.4-2014
Part 18, Industrial, Scientific, and Medical Equipment	<ul style="list-style-type: none"> FCC MP-5 (February 1986)
Part 15 Intentional Radiators below 26.5 GHz – except Part 15D and Part 15E (DFS)	<ul style="list-style-type: none"> ANSI C63.10-2013 KDB Publication 789033
Part 15 Intentional Radiators above 26.5 GHz – except Part 15D and Part 15E	<ul style="list-style-type: none"> ANSI C63.10-2013
Part 15, Subpart D UPCS	<ul style="list-style-type: none"> ANSI C63.17-2013
Part 15 Subpart E UNII	<ul style="list-style-type: none"> KDB Publication 905462
Licensed Radio Service Equipment Commercial Mobile Services	<ul style="list-style-type: none"> ANSI/TIA-603-D (2010) KDB Publication 971168
Licensed Radio Service Equipment General Mobile Radio Services	<ul style="list-style-type: none"> ANSI/TIA-603-D (2010)
Licensed Radio Service Equipment Part 96 Citizens Broadband Radio Service	<ul style="list-style-type: none"> ANSI/TIA-603-D (2010) KDB Publication 971168
Licensed Radio Service Equipment Maritime and Aviation Radio Services	<ul style="list-style-type: none"> ANSI/TIA-603-D (2010)
Licensed Radio Service Equipment Microwave Radio Services	<ul style="list-style-type: none"> ANSI/TIA-603-D (2010)
Licensed Radio Service Equipment Broadcast Radio Services	<ul style="list-style-type: none"> ANSI/TIA-603-D (2010)
RF Radiation Exposure	<ul style="list-style-type: none"> IEEE Std 1528™-2013 KDB Publication 865664 KDB Publication 447498
Part 20 Hearing Aid Compatibility (HAC)	<ul style="list-style-type: none"> ANSI C63.19-2007 ANSI C63.19-2011 KDB Publication 285076



Future Changes

- TCB Sample Requests through FCC website
 - Includes status updates on sample requests
- Pre-Approval Guidance
 - Separate from KDB
 - Audits for poorly performing TCBs
- TCB application dismissal
 - Pre grant
 - Post grant within 30 days
- TCB individual user logins
- Elimination of FCC letter mailing
- Clean up of old web links (EA731&2.948)



Questions?