General Policy Guidance - Updates

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Maximum Power Reduction Configuration to meet SAR or EMC (such as band edge) requirements.

- Must be clearly documented in the filing
  - Test reports and Tune up procedures must be consistent.
  - Provide a table indicating reduced power for appropriate frequencies and modes.
Permissive Change Policies
KDB 178919 (cont’d)

Antenna Guidance for reflectors
• Reflectors are treated as antenna assembly and must be authorized.
  • Only reflectors of the same type and equal and lower gain can be used

Software Based Permissive Changes for non-SDR devices
  – Operational description must make clear how control is maintained by the grantee
  – Third parties must not be able to modify parameters unless specific conditions apply
Confidentiality Request

Permanent confidentiality of internal photo’s or user’s manual.

- Internal photos can be held confidential
  - Circuit board covered with epoxy. Show photo with and without epoxy.
  - Device is not sold to end user
    - Requires agreement such as a Non-disclosure or purchase agreement that indicate device will be held confidential
- Non-consumer device is inaccessible to the general public, such as a device mounted on the top of a large tower or in a fenced or locked location that is only serviceable by the licensee or designated technicians.
  - Requires agreement such as a Non-disclosure or purchase agreement that indicate device will be held confidential and instructions on how the device will be installed and inaccessible.
Confidentiality Request – cont’d

- User’s manual can be held confidential
  - The manual is very technical and is not provided to the consumer because the consumer cannot service the device.
    - Requires agreement such as a non-disclosure agreement

- PBA filings must be clear and include appropriate supporting documents
  - Not enough to state that it is not consumer product
  - Necessary to provide examples of non-disclosure agreements
  - Authorized individual must provide justification letters
For licensed devices, check rules and frequency allocation chart for authorized frequencies.

- Avoid frequencies as discussed in the guidance

For Part 15 transmitters, check specific rule and do not list restricted band frequencies in Section 15.205.

Submit justification letter for extended frequencies on the grant.

For devices with software configuration control must include appropriate description as required in appropriate KDBs (for example, KDB 848637 and KDB 594280)
Use “EF” note code when listing frequencies outside that permitted by the appropriate rule parts

TCB audits
- Ensure compliance with extended frequency guidance.
- Dismissals issued for incorrect frequencies and/or when the justification letter or sufficient operational description is not submitted.
Permit But Ask
KDB 388624

Discussion on process
- File for FCC guidance well in advance for situations and devices on the PBA list
- Pre-TCB guidance is part of the PBA process but still requires TCBs to file the final PBA as appropriate
- PBA KDB is filed by TCB
  - TCBs must ensure that all the relevant pre-TCB guidance have been reviewed
  - Make sure review is complete before submitting to FCC
  - Identify and address specific issues raised by FCC guidance to ensure they are addressed
  - FCC partial review may not have addressed all the issues – this requires TCB careful review to avoid grant delays

Update on PBA List (see RF Exposure presentation)
- Modified requirements for 802.16e / WiMax
- Modified requirements for PTT radios