



General Policy Guidance - Updates

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Permissive Change Policies KDB 178919

- 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



Extended Frequency Guidance KDB 634817

- 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)



Extended Frequency Guidance KDB 634817 – cont'd

- 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