



Proposal for MPAG Scheduling Process

Alfonso G. Tarditi

Laboratory Division
Office of Engineering and Technology
Federal Communications Commission

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Overview

- 1. Present Challenges in the PAG Processing**
- 2. Proposal for MPAG Review Scheduling System**
- 3. Process Implementation**
- 4. Qualifying Requirements for MPAG Review Scheduling**
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Present Challenges in the MPAG Processing

- Manufacturers need to meet **near-term market deadlines**
- **Large** MPAGs filed often in the same period
- MPAG filings, complexly structured, **not well-mapped** to FCC PAG reviews
- Time-intensive process for **identifying** how the specific **PAG items** are being addressed/described
- Pre-submission final checks still leave missing items or incomplete data, thus leading to **repeated review iterations**

PAG Checklists are being introduced to mitigate some of these issues



Proposal for MPAG Review Scheduling System (I)

- Second iteration, following the initial outline of Oct. 2021 TCB workshop, for **MPAG scheduling proposed process**
- KDB Inquiry-based system to request **FCC-scheduled response date** for MPAG reviews
- Suitable for large filings, and **months-ahead** product developments
- FCC seeks **comments** following this presentation (preferably via TCBC monthly calls)



Proposal for MPAG Review Scheduling System (II)

- KDB Inquiry-based system to request FCC-scheduled **response date** on MPAG reviews
- Response is to provide **feedback** on MPAGs, **not necessarily approval**
- **Dates** set by FCC, based on workload and on first-come, first-served basis
- Only MPAGs meeting **specific criteria qualify** for this process (to avoid overload)
- Improving efficiency via **resource allocation** and room for conventional inquiries



Proposal for MPAG Review Scheduling System (III)

- Provisions for **additional feedback scheduling** (up to a limit) when review **iterations** are needed for TCBs to provide additional information
- Proposed Pilot-Program to **test** the overall **functionality**:
 - Preliminary **trial period** planned for about one year,
 - May be discontinued/modified **at any time** (without penalizing already submitted applications)
 - Start date to be announced via **TCBC monthly call**
 - Process to be formalized in a Notification Addendum to **KDB 388624**



Process Implementation

1) Request for MPAG review

- Preliminary package with information on number of devices (**number of FCC IDs**) and identification of **PAG items**

2) FCC schedules a review date

- Committed, **best effort** is made to meet the scheduled date, but it is **not binding**
- Any delay, albeit expected to be small (*e.g.*, a few days), communicated a.s.a.p.
- **Not an assurance** for approvals: may be request for more info, corrections, or deny

3) After the review

- Requests for additional information will come with a **new scheduled review date** for the additional feedback (factoring in the need for additional lab. time, as needed)
- At FCC discretion, **repeated review iterations** due to incorrect\insufficiently information, may result in **no further date scheduling**, reverting to standard process



Qualifying Requirements for MPAG Review Scheduling

- MPAG **size** threshold: **at least TBD (e.g., 4) PAG items** (to avoid “clogging” the system with a multitude of small MPAGs)
- Scheduled review date: **minimum TBD (e.g., 2) months** away from the initial request (KDB inquiry date).
 - For instance, if KDB request for MPAG scheduling comes in on June 1st, the review date will not be set before August 1st.
 - This process may lead TCBs to opt for the “standard” process in many cases, while making this approach more suitable for **longer-term planned projects** not yet ready
- Requests shall include an **MPAG outline**: e.g., device features, list of PAG items, variants from reference models, etc. Requests will not be considered until complete.
- Each MPAG may relate to more than one FCC ID, but **only for identified variants of a reference model**, and for the purpose of approved test reductions



Example 1: Approaching MPAG Scheduling

- Manufacturer is planning for the certification of a new device that consists of two models (“A” and “B”, w/different FCC IDs), to be **fully tested separately**
- TCB receives manufacturer’s preliminary documentation, **reviews it**, and **identifies** required PAGs, to qualify for the MPAG Scheduling
- TCB reports that model “A” has **four (or TBD)** separate items PAG, while model “B” requires two PAGs
- TCB informs the manufacturer that only model “A” **qualifies** for a request for MPAG review scheduling (based on the number of PAGs)
- Manufacturer opts to instruct TCB to submit two separate MPAGs, as per the standard process



Example 2: Approaching MPAG Scheduling

- Manufacturer is planning for a new device certification that consists of two models, **reference and a variant**, each with different FCC IDs, after obtaining KDB-approved test **data referencing plan**
- TCB receives manufacturer's preliminary documentation, **reviews it**, and **identifies** required PAGs to qualify for the MPAG Scheduling
- TCB reports that model "A" has three separate PAG items, while model "B" requires only one PAG: the **combined** MPAG package with both models **qualifies** for MPAG Scheduling (based on the number of PAGs)
- TCB submits requests for MPAG review scheduling via KDB (via anticipated **new MPAG Scheduling Category**) with the information about PAGs and FCC IDs



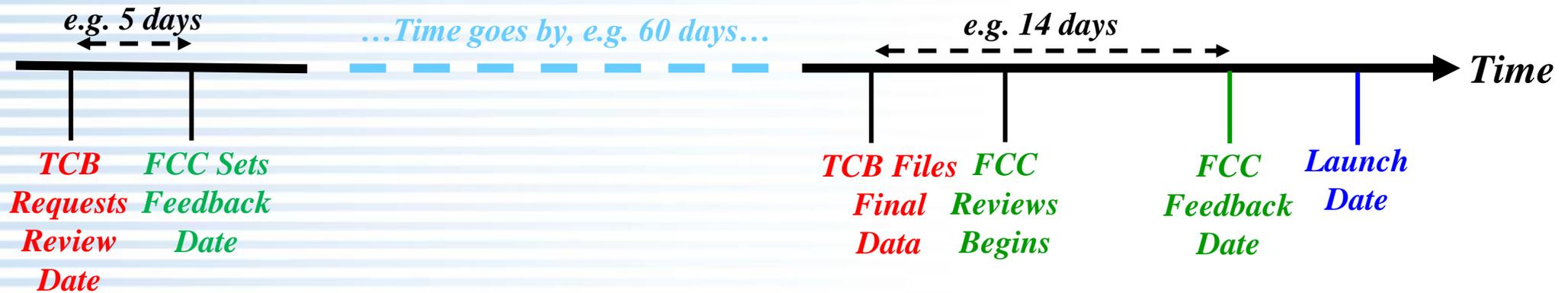
Example 3: MPAG Scheduled Review

- TCB sends **request** for MPAG review **scheduling** via KDB with information package containing PAGs and device(s) model description(s)
- FCC **responds** (*shortly, TBD*) with estimated **scheduled date** for MPAG feedback
- Lab **testing data** are sent to the TCB
- TCB **reviews** lab tests for **correctness** and files full applications at least **TBD** (*e.g. two weeks*) before the scheduled MPAG feedback date
- On the scheduled date, **FCC provides feedback** with a requests for clarification, and a new scheduled feedback date (to account for time required to collect the information)
- On the **new scheduled date**, FCC clears the PAGs for grant processing



Example 4: MPAG Review Timeline

- Notional **example of timeline** for the MPAG scheduled review process
- PAG items and applicable variants (number of FCC IDs) **named at the time of request** for review date scheduling
- All exhibits need to be filed **TBD days** before the review start date





Conclusions

- Proposed process designed to improve **efficiency** of FCC reviews
- Comments and trial period will provide important **tune-up feedback**
- **Checklist** are being added to all PAG items, to further improve the PAG review turnaround