Change in FCC ID

§2.933 Change in identification

Laboratory Division
Office of Engineering and Technology
Jihad Hermes

Note: The views expressed in this presentation are those of the authors and may not necessarily represent the views of the Federal Communications Commission.
Change in FCC ID – No CxPC

- Non-composite Original Grant
  - Change in ID for one 731

- Composite non-SDR – no change to functionality
  - Change in ID 731 for each original equipment class

- Composite with case-by-case considerations
  - Other considerations include rule changes, non-SDR software changes that can affect compliance, SDR approved devices
  - Change in ID case-by-case KDB Inquiry: How will non-SDR SW RF parameters be maintained, how will security be maintained, how will SDR changes be handled.
Change in ID with Permissive Changes

Original Grant with Permissive Change(s) followed with a Change in ID
- Change in ID can apply to original grant and/or permissive change(s); to be addressed in cover letter

Original Grant change in ID followed by original grantee (A) Permissive Change(s)
- Unless original cover letter limits Change in ID to specific grant date, new change(s) in ID can be made
- New grantee (B) will need to file a permissive change application for the new Permissive Change filed by the original grantee
- B permissive change filing does not convey to A

More Complex Examples
- SDR, Adding new Equipment Class, Rule Change are handled on case-by-case basis
Change in ID to a Change in ID

- FCC policy does not prohibit
- Equipment Authorization System does not prevent it
- Original grantee can limit Change in ID allowances in their authorization letter
  - TCB should validate conditions of original grantee authorization
Appendix
“... the applicant shall attach a statement setting out:

1. The original identification used on the equipment prior to the change in identification.

2. The date of the original grant of the equipment authorization.

3. How the equipment bearing the modified identification differs from the original equipment.

4. Whether the original test results continue to be representative of and applicable to the equipment bearing the changed identification.

5. Photographs showing the exterior appearance of the equipment, including the operating controls available to the user and the identification label ...”