



Administrative Issues

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Administrative Issues

➤ Introduction

- What is causing FCC issues
 - Audits/Sample Requests
 - Replies to audits
- What can be done now
 - FCC vs TCB actions
- What can be done in the future
 - FCC
- What is causing TCB issues
 - TCB questions



Confidentiality of exhibits

- **Inform clients exhibits are posted on Internet**
 - Except confidential ones
- **Guidelines in 12 - 02 TCB conference call**
 - Confidential always
 - SDR executable files
 - CSR info necessary to receive Cellular frequencies
 - ✓ Schematic and block diagrams, operational descriptions, parts lists, tune-up procedures and internal photos (See 0.457(d)(1)(ii))
 - Confidentiality available as “trade secret”
 - All devices
 - ✓ Schematic diagrams, detailed block diagrams, operational descriptions, parts lists, and tune up procedures



Confidentiality of exhibits (cont'd)

- Confidentiality available w/ “justification”
 - Internal photos
 - ✓ Non-consumer device
 - ✓ Components epoxy covered
 - ✓ Sealed case
 - User’s manual
 - ✓ Non-consumer device
- Confidential never
 - Test reports (EMC or SAR), external photos, FCC ID label, attestation statement, cover letters, test setup photos, and correspondence



Confidentiality of exhibits (cont'd)

➤ **After TCB Grant**

- Applicant/Grantee contact TCB
 - TCB contact FCC
 - Grant placed into audit mode
 - TCB fixes problem
 - Notifies FCC problem fixed
 - FCC audits application

➤ **After FCC Grant**

- File Class II permissive change with FCC
- TCB cannot change confidentiality on FCC app

➤ **Confidentiality procedures being reviewed**



Dismissal Requests

➤ From TCBs

- Within 30 days of grant (Section 2.962(e)(4))
 - Rescind grant
- From contact person listed on 731 Form
 - If request is made by person not listed on application, request is invalid.

➤ From Grantees

- More than 30 days after grant
 - Commission must revoke or dismiss at Grantee request
 - See Section 2.939
- From contact person listed on 731 Form

Payment of Grantee Code Fees



- **Payment must be received/processed in 30 days**
 - Urge clients to pay fee electronically
 - One time access to pay electronically
 - Learn manual payment procedures
 - Don't obtain multiple codes
 - Provide & review procedures w/client beforehand
 - Both admin & technical staff
 - Contact Bette Taube as last resort
 - Codes not paid for in the 30 days are forfeited/lost
- **Multiple access to 159 payment form**
 - Under consideration



Misuse of Policies/Features

➤ Five day “Grace Period”

- Applicants are requesting exhibits be withheld until “grace period” is up
 - Exhibits should be uploaded as soon as the application is completed
 - “Grace Period” can be removed if abused

➤ Supercede exhibit checkbox

- One application had no exhibits viewable on Internet 28 days after it was granted
 - Supercede exhibit box had been checked on all exhibits
 - Violation of 0.457 & Commission policy
 - Repeat violations will be dealt with



Admin Filing Problems

➤ **Place Exhibits in Proper Location**

- Internal and External photos in separate locations
- SAR is Exhibit 11 RF Safety not Exhibit 6 Test Report

➤ **Internal Photos**

- Remove shields to show components under
- Section 2.1033(b)(7) & (c)(12)
 - Show component location

Admin Filing Problems (Cont'd)



- **Inadequate Operational Description Exhibit**
 - Describe the EUT completely. (What is it? In plain English as well as in technical terms)
 - How it operates, modulation types, pulse repetition rate, signal type, information being sent
 - Do not cross-reference or duplicate user manual
- **Class II Grant Notes Wrong**
 - List highest SAR from all filings
 - Carry-over original grant note
 - Expand/modify previous note



Links to Check Regularly

- **Main TCB Screen under TCB Report Options**
- **Applications Awaiting Info/Samples**
 - No response to RT or RS requires FCC action
 - Grantee Code blocked – No more grants!
 - RT or RS sent to all listed contacts on 731
 - ✓ Please coordinate response
- **Incomplete Applications**
 - Incomplete applications are not granted
 - Incomplete applications are deleted after 30 days if no exhibits uploaded
- **Applications Missing Required Exhibits**
 - Applications are incomplete



Test Firm Search

➤ **Accredited Test Firms on Website**

- Electronic filing site under Reports, Test Firms
 - Select 2.948 listed or Accredited
- Listed by accreditor
 - NVLAP & A2LA
 - If not on Website, contact your accreditor

➤ **2.948 Listed Test Firms on Website**

- Listed by FCC
 - Contact Tom Phillips if problems



Interim SDR Policy

➤ Additional Exhibits for SDRs

- Functional flow chart of software program
 - Block diagram exhibit
 - Actual software not uploaded
- Description of security & management procedures for upgrades
 - Operational description exhibit
- If software fails:
 - Test report exhibit
 - Demonstrate continued compliance with rules, or
 - Equipment shut-down

➤ TCBs Prohibited from Processing SDRs



Administrative Issues

➤ Summary

- Confidentiality of exhibits
 - Always confid, “trade secret” confid, justified confid & never confid
 - Remove exhibits from Internet for existing grants
 - Under FCC review
- TCB grant dismissal requests
 - < 30 days = TCB
 - > 30 days = Grantee
- Grantee Code fee payments
 - Allow processing time for payment w/in 30 days
 - ✓ Lose Grantee Code



Administrative Issues (cont'd)

➤ **Summary (Cont'd)**

- Misuse of Policies/Features
 - 5 Day “Grace Period”
 - Supercede exhibits
- Admin Issues
 - Location of exhibits
 - Photos show component location
 - Poor or no operational description
 - Class II grant notes wrong



Administrative Issues (cont'd)

➤ **Summary (Cont'd)**

- Links to check regularly
 - Incomplete applications
 - Apps awaiting info/samples
 - Apps missing exhibits
- Accredited labs on FCC Website
- Interim SDR policy
 - Special exhibits required
 - TCBs prohibited from processing SDR apps

➤ **Questions**

- What issues are TCBs having?
 - Any suggestions on how can we help?