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

➢ Confidentiality procedures being reviewed
Dismissal Requests

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

➢ From Grantees
  o More than 30 days after grant
    • Commission must revoke or dismiss at Grantee request
    • See Section 2.939
  o 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?