



# **Administrative Review**

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# **TCB Application Exhibit Modifications**

## **Upcoming Changes / Mods**

**Sandy Haase**



# TCB Exhibit Upload Procedure Change (June 27, 2006)

- ***Required Exhibits Uploaded Prior to Grant***
  - Five day grace period eliminated
  - Supersede available to TCB before grant only
  - View attachments at “Pending Application Status” on EA and/or TCB e-filing pages
- **Granted less than 30 days**
  - Additional exhibit(s) may be uploaded
  - Exhibit(s) may be marked Confidential or Short Term Confidential



# Supersede After Grant

- ***Supersede no longer available to TCB***
  - Options for incorrect exhibit(s) upload
    - *More than two exhibits* – request dismissal from [easadmin@fcc.gov](mailto:easadmin@fcc.gov) with justification
    - *Two exhibits or less, < 30 days from grant and essential* – request supersede
      - Upload replacement exhibit(s)
      - Upload explanation letter into Cover Letters exhibit
      - E-mail to [easadmin@fcc.gov](mailto:easadmin@fcc.gov) with justification
      - Request fulfilled by FCC and EAS e-mail sent (becomes part of correspondence history for accreditation)



## Supersede After Grant > 30 Days

- E-mail to [easadmin@fcc.gov](mailto:easadmin@fcc.gov) with reason, File Description, request to place into audit mode
- EASADMIN notifies TCB of audit mode
- TCB uploads letter of explanation and correct exhibit(s)
- TCB notifies EASADMIN of completion of all requirements
- FCC supersedes pertinent exhibit(s)



# Status of Implementation to Date

## ➤ *Requests Received by FCC for Change*

- Change request for ~1.5% TCB filed applications
- Dismissals and supersede ~ equal
- Justification for request - confidentiality and other errors ~ equal
- Some repetitive trends in TCB requests





# Status of Implementation to Date (cont'd)

## ➤ **Conclusions**

- Confidentiality is most significant issue with greatest applicant impact
- TCB should request applicant review filing at Pending Application Search – critical when confidentiality is an issue
- Make File Description unique for any exhibit uploaded - facilitates identification
- FCC review of applications requesting exhibit supersede often reveals other issues unrelated to the request (incorrect labelling, exhibits filed in wrong exhibit types, etc.) – better application submittal / review required



# Correspondence Guidelines

- Policy / Interpretation Issues
  - [www.fcc.gov/labhelp](http://www.fcc.gov/labhelp) (KDB Inquiry)
- Administrative 731 Application Issues (*pre-grant and post-grant administrative issues related to an application submittal or grant*)\*
  - [easadmin@fcc.gov](mailto:easadmin@fcc.gov)
- Technical 731 Application Issues (*generally, pre-grant issues specific to the technical information required in an application submittal*)\*
  - [eastech@fcc.gov](mailto:eastech@fcc.gov)
- TCB Accreditation Issues
  - Submit Correspondence (*link in online TCB filing pages*)
    - Initiate Correspondence with the OET Lab (*online link*)

\*Not intended for responses to OET generated requests for specific application information





# Upcoming Upgrades / Mods

## Communications / Documentation of TCB / Accreditor / TCB Designating Authorities

- Correspondence Processing ([Submit Correspondence](#))
  - Respond to OET Correspondence pertaining to an FCC Form 731 (Requires Correspondence Reference Number and Confirmation Number)
  - Respond to TCB Accreditation Correspondence
  - Initiate Correspondence – for TCB / accreditation related correspondence only
  - All of the above allow for Text Response and Attachment upload



# Upgrades / Mods (cont'd)

- Add Attachments (to an FCC Form 731 application)
- Submit Surveillance Report
  - Submit required Annual Report
  - PDF format only
  - Automatic reminders sent
- View TCB Accreditation Attachments
  - View attachments associated with TCB
  - View correspondence on file for TCB



# Upgrades / Mods (cont'd)

- Key Employee List
  - View key employees for logged in TCB
  - Export key employee list to MS Excel (only available through Internet Explorer)
  
- TCB Exclusion List
  - Posting of most recent Exclusion list
  - Available through KDB ([www.fcc.gov/labhelp](http://www.fcc.gov/labhelp) )
  
- Above modifications effective approximately 10/11/2006



# Upgrades / Mods (cont'd)

- Short term Confidentiality
  - “Courtesy” automatic e-mail generated at seven calendar days prior to expiration of the STC period
  - E-mail sent to TCB and applicant
  - Only one “warning” sent
  
- Approximate effective date of above mod – 11/7/2006



# Procedures Review

**Bette Taube**



# 731 Application Review

- Required exhibits uploaded into correct exhibit type and uniquely identified by File Description
- Check for FCC ID Label Correctness / location
- Confidentiality Request Letter uploaded into Cover Letter Exhibit Type, if applicable
- Exhibits appropriately marked Confidential or Short-term Confidential
- Cover letter describing application / amendment uploaded into Cover Letter Exhibit Type, if applicable
- Recommend applicant review (especially for confidentiality)
- All requirements met – issue Grant





# Permanent Confidentiality

## ➤ ***Eligible***

- Schematic Diagrams
- Detailed Block Diagrams
- Operational Description
- Parts Lists
- Tune-up Procedures

## ➤ ***“Optionally” Eligible with Additional Justification***

- Internal Photos (permanently mounted / sealed, not publicly accessible)
- User’s Manual (highly technical, not serviceable by consumer; not provided to consumer; provided to consumer based on non-disclosure agreement)



# Permanent Confidentiality (cont'd)

## ➤ ***Not Eligible***

- Test Reports
- RF Exposure Test Reports
- External Photos
- FCC ID Labels
- Attestation Statements
- Cover Letters
- Test set-up Photos
- Correspondence

## ➤ ***Always Confidential***

- SDR Software / Security Info
- Scanning Receivers (schematic diagrams, block diagrams, operational descriptions, parts lists, tune-up procedures and internal photos )



# Short Term Confidentiality

- ***May be applied to all Exhibits eligible for Permanent Confidentiality***
  - Schematics, Block Diagrams, Operational Description, Parts Lists, Tune-up Procedures
    - **Only one type of confidentiality** can be applied per attachment exhibit (i.e. Confidential or Short-Term Confidential)
  
- ***Additional Exhibits (Short Term Confidential only)***
  - Internal Photos
  - User's Manual
  - External Photos
  - Test Set-up Photos



# Short Term Confidentiality

- Granted for 45 calendar day increments from the date of grant
- Extend within the 45 calendar day period
  - Encourage applicant's diligence in requesting timely extensions
  - Can extend at day one of any STC period
- Maximum of four extensions from date of grant
- Exhibits automatically released to the public at expiration date
  
- **Release** information to the public **immediately** when marketing begins



# Confidentiality Request Process

- ***Form 731 – check “Yes” box for Confidentiality Requested***
- ***At “Add Attachments” check all exhibits for which confidentiality is requested***
  - Check only one type—Confidential or Short Term Confidential
- ***Upload justification letter (Cover Letters exhibit)***
  - Letter dated / signed with FCC ID list of exhibits to be held Confidential or Short Term Confidential
  - Justification
    - *Reference and comply with Rule Parts 0.457 and 0.459*
    - *State reason for request (proprietary, trade secret, etc.)*





# Post-Grant Confidentiality

- **Confirm with the applicant the need to mark information confidential *before* grant**
- ***Request made for Post-Grant Confidentiality within 30 days – standard procedure for corrections (TCB responsibility)***
- ***Request made for Post-Grant Confidentiality 30 days or more after grant (FCC must approve) –***
  - Request “audit” mode through [easadmin@fcc.gov](mailto:easadmin@fcc.gov) with justification and FCC ID
- ***Upload letter request into Cover Letters exhibit***
  - Justification letter for confidentiality if not already in application
  - Identify exhibit(s) to be held confidential
  - Written / dated request with FCC ID
  - Include justification for correction
    - Include documentation of the applicant’s awareness that information has been publicly available (including dates public)





## **Grantee Code Information Review**

- ***When submitting Form 731, review all Grantee Code information for correctness and completeness***
  - Applicant Name and Address
  - FRN is applicant's assigned number
  - Contact Name & Title, E-mail, Phone, Fax
- ***Contact applicant if in error***
- ***Changes should be made at EAS Web site Modify Grantee Information***



**Questions ???**

*Thank You !*