



Administrative Review

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TCB Workshop



TCB Filing Procedures

- Improvement from ~ 1.5% of submittals requesting change to < 1% (figure is not correlated with audit rate errors)

- Prevalent Administrative Issues
 - Request for Supersede
 - Confidentiality (Permanent and Short Term (STC))

- Review spam filters to allow e-mails from following:
 - oetech@fccsun27w.fcc.gov
 - oetech@fccsun34w.fcc.gov



Supersede Refresher

- > 2 exhibits require dismissal
- TCB can supersede only prior to grant
- *Two exhibits or less, < 30 days from grant and essential* – request supersede
 - Upload replacement exhibit(s)
 - Upload explanation letter into Cover Letter(s) exhibit
 - E-mail to easadmin@fcc.gov with justification
 - Request fulfilled and EAS e-mail sent by FCC (becomes part of correspondence history for accreditation)



Supersede Refresher (cont'd)

➤ > 30 days from Grant

- E-mail to easadmin@fcc.gov with reason, File Description, request to place into audit mode
- EASADMIN notifies TCB of audit mode
- TCB uploads letter of explanation into Cover Letter(s) exhibit and correct exhibit(s)
- TCB notifies EASADMIN of completion of all requirements
- FCC supersedes pertinent exhibit(s)
- Cover Letters should not include the TC#



Grant Correction vs. Grant Change

➤ Grant Correction

- Administrative error
- No change in the basic decision related to the authorization
- May be a Grant change or an exhibit revision
- Restricted to either correcting the Grant or clarifying the exhibit – not both

➤ Grant change

- Results in a change in the basic decision related to the authorization
- The Grant is corrected and one or more exhibits is modified
- Permissive Change required



Grant Correction Process

- Follow supersede procedure to submit corrected exhibit
 - Missing exhibit <30 days from grant – TCB can add; >30 days from grant - TCB request thru easadmin@fcc.gov
 - Data correction < 30 days from grant – TCB makes corrections; > 30 days grant request thru easadmin@fcc.gov
 - Request thru easadmin@fcc.gov must include appropriate justification and not exceed two exhibits
- *Note: a software change resulting in new data on the Grant is a PC, not a correction



Grant Change Process

- Grant change requires a Permissive Change filing, or new submission with new FCC ID
 - Defined (in general) by a change to the grant in combination with a change to a technical exhibit
 - TCB should consult with FCC (thru eastech@fcc.gov) if unclear if PC is required
 - TCB should not take liberty of changing Grant & uploading new exhibit(s) to effect the change without a PC if <30 days
 - >30 days - if above criteria is met a PC filing will be required



Confidentiality

- Ensure applicant is clearly informed of the requirements for Confidentiality (both Permanent and STC)
 - Any exhibit not marked Confidential or STC (or superseded) is publicly available at the time of Grant. Ensure that non-confidential exhibits do not contain confidential information
 - Ensure all Confidential exhibits are appropriately marked – Permanent or STC
 - Mark at time of upload and prior to issuance of Grant
 - Must be in accordance with Grantee request
 - Review Cover Letter submission for appropriate justification
 - Letter should contain a specific STC date or period (45, 90, 135,.. .)
 - not 3rd quarter, etc.
- * Note: Uploading the request letter is not the same as “marking” the appropriate exhibit Confidential



Confidentiality Review

- Always held confidential –
 - Software Defined Radio (SDR) / Cognitive radio – attachments in SDR Software/Security Info folder
 - Scanning receiver data listed below as “commonly held confidential” and internal photos

- Commonly held confidential – schematics, block diagrams, operational descriptions, parts lists, tune-up procedures



Confidentiality Review (cont'd) – Special Circumstances

- Special circumstances – requires consultation with the FCC thru eastech@fcc.gov
 - Internal photos – epoxied or otherwise sealed circuit board, sealed device, non-consumer device serviceable only by the grantee or designated tech (non-disclosure agreement may be required)
 - User's manual
 - Technical and used as a service manual only by qualified technicians (non-disclosure agreement may be required)
 - Manuals for OEM use only



Exhibits Not Granted Permanent / Indefinite Confidentiality

- Not held permanently confidential – test reports, RF exposure test reports, external photos, FCC ID labels, attestation statements, cover letters, test setup photos, correspondence. Generally, neither internal photos or user's manuals.
- Block diagrams of PCs, PC peripherals and other unintentional radiators - detail not required by Rules, therefore not held confidential



Third Party Confidentiality

- Applicant or agent not authorized to view proprietary information for certain portions of a device integral to their product, but a “trade secret” of another company (third party)
- FCC approved devices - third party may submit information to FCC based on agreement with applicant who provides FCC ID and Form 731 confirmation # (EA#) to third party
- TCB approved devices - third party may submit information to the TCB; TCB files information on behalf of the third party, with agreement regarding confidentiality of information



Authorization & Contact Information

- Grantee Code Information (Fixed)
 - Applicant Business Name / Mailing Address
 - Person at Address to receive Grant
- Instead of applicant, mail to:
- Technical contact
- Non-Technical contact
- Test Firm (in master TF DB, and in application)
- TCB (in master TCB DB)
- Authorized Agent
 - Authorization Letter in Cover Letter(s) exhibit signed by Grantee (person at Address to receive Grant)
 - May be “authorized” by originally Authorized Agent
 - 731 Information completed



Authorization for Form 731 Modifications

- Confidentiality – must be requested by Grantee or authorized agent
- Modifications / changes
 - Requests by any listed 731 contact accepted
 - Requests by any listed Test Firm or TCB contact accepted
- Coordinate with easadmin@fcc.gov

* Note: Keep contact information for your organization and applicant up to date



New TCB / EAS Upgrades

- Links for contacting FCC
 - Grouped together within TCB Login area
 - EASTECH or EASADMIN option will prompt a selection from TCB contacts on file in FCC DB – one to many can be selected
 - Info request from within TCB login area flags FCC that request is high priority
 - KDB Upgrade – Implementation Pending
 - Allows TCB specific categories to be available when logged in as a TCB
 - Inquiry marked as high priority and routed to specific FCC expert

- New server with automatic failover – fjallfoss. Please ensure bookmarks have been changed accordingly



Administrative Contact Program

- Purpose
 - Responsible party for administrative issues
 - Primary contact for EASADMIN
- Added to the Key Personnel module
 - Send to easadmin@fcc.gov with descriptive subject line of Admin Key Personnel in e-mail
- Implementation
 - All correspondence re admin issues will be CC'd
 - Targeted administrative training
 - Phone conferences directed to admin issues
 - Broadcast e-mails re admin issues



Attachments Control

- Initiated with KDB
 - FCC Template added as “watermark”
 - Document dated
 - Version control number linked to KDB Publication #

- Methodology to be expanded
 - Measurement Techniques
 - EA Procedures on www.fcc.gov/oet/ea pages
 - All docs will also be in KDB



Knowledge Data Base Review

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KDB Problems / Issues

- Retain Inquiry Tracking number to “complete” the inquiry. If clarification or additional information is required after receiving a response, please enter those concerns using the original tracking number. DO NOT use a new tracking number.
- Conversely, do not continue to use the same Inquiry Tracking number when the topic has wandered from the original inquiry
- When possible, coordinate questions within an organization - do not send repeat questions from multiple parties
- Do not revise the question hoping for a different answer



KDB Statistics

➤ KDB Inquiries

- On track to receive approximately 1650 inquiries in 2007
- Approximately a 10% increase over 2006

➤ KDB Publications

- Quality Control Program in Progress
- Clean-up of current publications
- “New” KDB publications in some instances editorial updates of previous publications



Usage Statistics

- Most commonly requested categories
 - Part 15 Intentional Radiators
 - Permit but Ask
 - Certification
 - Declaration of Conformity (DoC)
 - Labelling

- Approximate usage by TCB vs. General Public – Ratio of 3:1



TCB Specific KDB Program

- Permit But Ask – allows both TCB issuance of a grant, and FCC oversight
 - Current examples
 - No test procedure / measurement technique published (WiMax / IEEE 802.16E)
 - Inadequate standard test equipment (Part 27 AWS, BRS, EBS, etc. – no call processing simulator)
 - Devices complying with extremity SAR limits

- TCB Login for Higher Priority

- TCB only Categories



TCB Recommendation Program

- Establish an e-mail address for consideration by the FCC of improvements / changes:
 - KDB Publications
 - TCB Website
 - Search Options

Send input / recommendations to
eastcbupgrade@fcc.gov



Questions ???

Thank You !

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