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 –
  - 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

Bessie Bordenave

October 9-11, 2007

TCB Workshop
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!