



Administrative Clarifications / Issues

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TCB Workshop



Prevalent Administrative Issues

- Grantee Code Information Review
- Supersede Requests
- Dismissal Requests
- Grant Modification Requests
- Confidentiality
- Miscellaneous



Grantee Code Information Review

- **When submitting a Form 731 – review all pre-filled Grantee Code information for correctness and completeness**
 - Applicant Name and Address
 - Applicant FRN
 - Contact Name & Title, E-mail, Phone, Fax

- **Contact applicant if in error**

- **Changes should be made on EAS Web site – Modify Grantee Information**



Supersede Refresher

- TCB can supersede attachments only prior to grant (Incomplete status)
- Greater than two exhibit types requires dismissal
- Send e-mail to easadmin@fcc.gov and include:
 - Justification for supersede
 - TC# in the e-mail only (not required in cover letter)
 - If request is for a composite application, include the TC# for all composite applications and specify change (or no change) to each



Supersede Process

- E-mail to easadmin@fcc.gov with justification
- Upload replacement exhibit(s) when instructed by FCC
 - Multiple attachments are accepted within one exhibit type
- Upload a letter of explanation into the Cover Letter(s) exhibit type
- Inform easadmin@fcc.gov of completion of uploads
- Request is completed by the FCC sending an e-mail that becomes part of the correspondence history for purposes of accreditation



Request for Dismissal

- Reasons for Dismissal
 - Supersede request for greater than two exhibit types
 - Incorrect Grant (i.e. Grantee Code wrong)
 - Applicant request

- Justification required and must include specific details explaining the reason(s) for the request

- Dismissal request must include statement that equipment has not (and will not) be marketed
 - Above applies whether request is less than or greater than 30 days from Grant

- Dismissals are not viewable on the Web



Supersede Justifications

- Editorial Changes only are acceptable
 - Specific named typographical errors
 - Incorrect label drawings
 - Incorrect references to a third party in an attachment
 - User's manual updates

- Unacceptable Justifications
 - Model number changes that are not typographical errors
 - Changes affecting the operation of the equipment (power, frequency, software, etc.) – an additional filing for new equipment or permissive change is required
 - A “typographical error” that is included in both the application and in the attachment (thus affecting the operation as noted directly above)



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 review prior to issuance of Grant
 - Must be in accordance with Grantee request in Cover Letter(s) exhibit
- Review Cover Letter submission for appropriate justification
- Cover Letter(s) exhibit should contain a specific STC request including the release date and the exhibits to be held STC
 - 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 exhibit type
 - Scanning receiver information included in exhibit attachments listed below as “commonly held confidential” and internal photos, in accordance with 0.457(d)(ii)

- Commonly held confidential (upon justification and request) – schematics, block diagrams, operational descriptions, parts lists, tune-up procedures

- *Note: The ID Label/Location Info exhibit type is always required for an original Grant and never held confidential*



Exhibits Not Granted Permanent 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 nor user's manuals.
- Block diagrams of PCs, PC peripherals and other unintentional radiators - detail not required by Rules, therefore not held confidential



Confidentiality Review – Special Circumstances

- Special circumstances – requires consultation with the FCC thru a KDB Permit But Ask (PBA)
 - 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 that include proprietary information



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)
- TCB approved devices - third party shall submit information to the TCB; TCB files information on behalf of the third party, with agreement regarding confidentiality of information



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 (continued)

- Granted for a specific date – pre-fills on TC731 at 45 days from date of filing / Grant
- May be extended up to 180 days at Short Term Confidential Maintenance Option on TCB Web Site
- 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 Letter(s) exhibit)***
 - Letter dated / signed with FCC ID list of exhibits to be held Confidential or Short Term Confidential
 - Include the exhibit type and the exhibit description in the letter
 - Justification
 - Reference and comply with Rule Parts 0.457 and 0.459
 - State reason for request (proprietary, trade secret, etc.)



Post-Grant Confidentiality

- **Most critical element of the Form 731 - 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 with justification, TC#(s), and FCC ID (FCC will inform when placed into “audit”)

- ***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 publicly available)***



Questions ???

Thank You !

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