Transmitters Certified Under Multiple Rule Parts Summary

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Certification Under Multiple Rule Parts

Former “Combo” Policy
- Replaced KDB149672 with Updated Policy
- New Policy is Rule Based
  • TX Multiple Rules: Section 2.1033(e) & Section 15.31(h)&(k) permit Composite Systems
  • Restrictions for devices operating under Multiple Licenses or Licensed-by-Rule Radio Services

General Requirements
- Devices must meet all general rules and technical requirements for each applicable rule part
- No specific restrictions for transmitter devices in combination with unlicensed Part 15 rules

Section 15.31(k) defines a composite system as a “system that incorporates different devices contained either in a single enclosure or in separate enclosures connected by wire or cable. If the individual devices in a composite system are subject to different technical standards, each such device must comply with its specific standards.” Composite devices have one FCC ID. Multiple applications with the same FCC ID are required if there are multiple Equipment Classes.

Licensed-by-rule radio services do not require the user to obtain a license. (e.g., some part 95)
Restrictions

- Not permitted by Rule
- Permitted with additional requirements over individual rule parts
- Require special Permit-But-Ask Procedure (KDB 388624) prior to Certification
- Restriction Basis:
  - Rules, Wireless Telecommunications Bureau (WTB) policy, Safety Issues, or Requirements specified by other government agencies (e.g., FAA, USCG)
Transmitters Prohibited by Rule

- MURS (Part 95J) in combination with and other licensed or licensed-by-rule services
- Amateur (Part 97) in combination with Part 80, Part 87, Part 95A (GMRS) or Part 95D (CB)
  - Exception: Part 87 VHF 118-136.975 MHz band
- Part 15.257 and Part 101 at 92-95 GHz
  - Cannot be both Part 15 device and Part 101 device
  - Determination based on Rules (Note: Part 15 is indoors only)

Section 97.11(b) states: The station must be separate from and independent of all other radio apparatus installed on the ship or aircraft except for 87 Aviation VHF 118-136.975 MHz band

Section 95.665(a) states: No transmitter will be certificated for use in the CB service if it is equipped with a frequency capability not listed in §95.625, and no transmitter will be certificated for use in the GMRS if it is equipped with a frequency capability not listed in §95.621, unless such transmitter is also certificated for use in another radio service for which the frequency is authorized and for which certification is also required. (Transmitters with frequency capability for the Amateur Radio Services and Military Affiliate Radio System will not be certificated.)
Transmitters Permitted With Additional Requirements

Part 80 VHF
- Section 80.203(b) requirements
  - External controls must not be capable of being programmed by station operators to transmit on channels other than those programmed by the manufacturer, service or maintenance personnel
  - This generally prohibits Part 80 VHF transmitter devices from operating under multiple rule parts but there are a few exceptions
    - Exception: Part 80 in combination with Parts 22 and/or 90 operating on AMTS or VHF Public Coast (VCP) channels

Part 80 On-board transmitter (Section 80.1175)
- approved on case-by-case basis
Coordination w/ Other Government Agencies

- Part 97 (Amateur) in combination with Part 87 (Aviation VHF 118-136.975 MHz)
- Part 80 EPIRB, Part 87 ELT, Part 95K PLB in combination with any other transmitter
Questions and Answers

Thanks!