Market Surveillance Review

TCB Workshop October 2011

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FCC

2010 Market Surveillance Report Summary

- All reports submitted have been FCC reviewed
  - All info requests have been sent by FCC
  - Last 11 RTs just sent in October
  - Next year requests will be sent much earlier
- 34 of 36 TCBs granted Certifications
- 3 TCBs submitted reports that required no follow up (9%)
  - One TCB corrected their surveillance report based on April TCBC comments without FCC request
- 14 TCBs responded acceptably to FCC information Requests (41%)
- 17 TCBs still need to respond to FCC questions (50%)
- FCC will be discussing issues with Accrediting Bodies

2010 Market Surveillance Report Summary

- Total Products Audited
  - Updated from April TCBC based on FCC follow up
    - Scope A/B – 453/11461 = 3.95%
    - RF Exposure/SAR testing - 65/4964 = 1.31%
    - Non Compliant 44/453 = 9.71%
- FCC Action Summary
  - 43 Grantees contacted
    - 6 issues not resolved
  - 22 Resolved/responded acceptably
  - 15 Grantee Codes blocked
  - One non compliance being forwarded to Enforcement Bureau

FCC Market Surveillance Policy

- ## KDB 610077
  - **https://**apps.fcc.gov/oetcf/kdb/forms/FTSSearchResultPage.cfm?switch=P&id=20540
    - January 11, 2011 revision clarified non compliance reporting
    - June 8, 2011 revision clarified audit counting method

- ## Surveillance Policy Summary
  - Audit 5% of Scope A/B Certifications/year
  - Audit 2% of Scope C approvals/year
  - Audit 1% of Certifications with SAR testing/year
  - Must test products
  - Audits should be performed throughout the surveillance year and not all at end or after year
  - Number of audits based on grants not unique FCCIDs
  - % required based on grants issued in surveillance year

FCC Market Surveillance Policy

- Non Compliance Reporting
  - Send summary to FCC easaudit@fcc.gov immediately
  - Notify Grantee immediately and determine resolution
  - Submit resolution/follow-up to FCC within 30 days
    - Submit thru "Submit Surveillance Report" link
- Annual reporting summary requirements
  - Indicate total EMC device grants and SAR device grants
  - Submit report summary for calendar year
    - Surveillance year 01/01/2011 – 12/31/2011
    - File summary thru "Submit Surveillance Report" link
    - Submit summary by January 31, 2012
    - 2011 Audit % based on 2011 authorizations
    - Don't submit details of compliant surveillances (only summary)

Audit Process

- Common Audit Issues
  - Don't wait until end of surveillance period to request all audits
    - Request audit samples throughout year
  - Auditing devices granted in previous years is acceptable but may lead to samples no longer being available
    - Attempt to audit more recent authorizations
  - Identifying grantee surveillance obligations in TCB contract may reduce non responses.
  - Ensuring grantees review grants and knowing TCB authorized may reduce non responses
    - Agents working for grantees issue grants and applicant is unaware TCB issued grant

No Response/Sample not provided

- Notify FCC of non responsive applicants or applicants unwilling to send samples
  - Not marketed in US is not valid reason for not providing sample
  - Send FCC summary of attempts made to obtain sample
    - Don't copy FCC on every correspondence
  - When a sample isn't tested it doesn't count as an audit

When Audit Doesn't Comply

- Immediately notify FCC of non compliance
  - Email to easaudit@fcc.gov
  - Included summary of non compliance
- Immediately notify Applicant
  - Work with applicant to determine resolution
- 30 Days after FCC notification send FCC update
  - Submit thru "Submit Surveillance Report" link
  - Include detailed information about issue
- TCBs work with applicant until issue resolved
  - Notify FCC of final resolution thru "Submit Surveillance Report" link
  - If not resolvable send summary to FCC identifying all attempts to resolve

2011 Surveillance Reports

- FCC Goal – Receive complete and consistent reports that we can compare and easily determine coverage and compliance rates

- Thru October 20, 2011 10255 TCB certifications
  - Only 3 TCBs have submitted surveillance follow up information for 2011 audits
    - Next annual summary due by January 31, 2011
    - Non compliance follow up due 30 days after audit
  - Very limited emails for 2011 to easaudit@fcc.gov

2011 FCC Expected Reporting Improvements

- Audit Counts based on number of authorizations issued
  - Include composites
  - Include Permissive changes
  - Indicate number of RF Exposure grants
- Devices tested in 2011 calendar year
- Adherence to follow-up procedures
  - Immediate notification to EASAUDIT@fcc.gov
  - All follow up thru "Submit Surveillance Report" Link
  - Complete follow up with applicant and notify FCC of result
- Summary list/report only for compliant surveillances
- Summaries will indicate specific tests for all audited devices
- Not necessary to submit KDB 610077 and copy of FCC selection criteria as part of report

KDB 610077 Changes

● Clarify Information in FCC Summary
  – Specify reporting period
  – Indicate total number of authorizations
  – Indicate total number of authorizations where RF Exposure testing applies
  – For all audits specify what testing performed or if all requirements tested
  – Specify testing date for each audit

Website Update

- How many grants did I issue?
  - "Grants per Year" link
    - Allows current and previous year search
  - Authorization Search based on grant line entries and not accurate for grant count
  - Total may change slightly due to dismissals
- Format of follow up emails being corrected

Questions and Answers

Thanks!