



# Administrative Issues

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# Administrative Issues

- EAS Information
- Confidentiality
- Permit But Ask Process



# EAS Information

## ➤ Current Issues

- Service improvements – server moved to Headquarters and re-indexing of data
- TX of Control or Name Change
  - 1<sup>st</sup> Change Address or Contact Information Only
  - 2<sup>nd</sup> Change Name or Transfer of Control

## ➤ Future Changes

- Full re-design unfunded – incremental improvements planned
- Grantee Code expanded to five characters
  - Retrieve lost codes and possibly reclaim old codes
  - 1<sup>st</sup> character of five always a number
  - Product Code remains 14 characters
  - Full FCC ID 17 characters (3 char GC) or 19 (5 char GC)
  - Legacy Codes (3 characters) always begin with a letter



# Updated Procedures to Request Confidentiality

- Review KDB 762920 Draft Publication
  - Propose to permit certain approvals for confidentiality requests by TCBs without filing Permit-but-Ask
  
- Review of Long Term Confidentiality of Internal Photos and User's Manuals proposed for TCB responsibility
  - Internal Photos
    - Epoxied circuit board or sealed assembly in consumer device
    - Non-consumer device – not accessible to public
    - If requested for modules, the final host must not be accessible to public
  - User's Manual – technical and non-consumer serviceable
  
- Exhibit Requirements
  - Cover letter with authorized signature justifying non-routine confidentiality
  - Non-consumer application – Non-Disclosure Agreement (NDA) between grantee and purchaser or system integrator (not the TCB!)
  
- Special Circumstances
  - Exhibits not typically held confidential (i.e. external photos)
  - PBA still required



# Proposed Review Permit But Ask Process

- Objective – guide TCBs in issuing Grants for:
  - Applications where FCC has issued only partial guidance
  - Test procedures are under development
  - Commission oversight remains necessary
- In general the PBA process applies to TCBs on how to consult the Lab prior to issuing the grant
- The revised procedure generally relies on the test labs and manufacturers to use published guidance where possible but also allows them to submit inquiries to get further clarifications
- Revised procedure relies on the TCB performing a thorough review prior to seeking final approval
- FCC review will be mainly at the end of the application process and manufacturers must allow time for the review; lack of detailed review and documentation will delay the approvals



# Proposed PBA Process (cont'd)

- Test Firms, Manufacturers, etc. responsibilities
  - Follow published guidelines where available and applicable
  - Submit full documentation of how the guidelines apply to the circumstances of the authorization and the specific device to the TCB.
  - In cases where the guidance is not sufficient or there are unique circumstances - request specific guidance by submitting an inquiry to the Commission
    - Use “Measurement Procedure Guidance for Evolving Technologies” Category when submitting KDB inquiry
    - In some cases there may be a need to submit preliminary data to get additional direction for test reductions.
    - Once testing is completed according to the guidance, submit the filing for TCB approval including the following:
      - All KDB applicable Inquiry Tracking Numbers.
      - Complete Copy of KDB Inquiry Correspondence.
      - All attachments submitted with the KDB Inquiry(ies).
      - Description of how the guidelines in each KDB have been met.
      - Instruction to TCB regarding confidentiality of documents (if appropriate)



# Proposed PBA Process (cont'd)

- TCB responsibilities
  - Evaluate, Review, Affirm, Coordinate to Completion !!!
    - Ensure entire application is acceptable; all guidance followed?
    - Have all compliance issues and authorization requirements addressed?
  - Enter Form 731 info, including KDB Inquiry correspondence provided previously by test firm, manufacturer, etc.
  - Submit a single PBA KDB Inquiry, with all KDB Inquiry numbers submitted by test firm, manufacturer, etc. in the text box.
    - For questions about the application, provide sufficient details in the inquiries
  - Update Form 731 with single PBA KDB Inquiry Tracking number.
  - Submit final Reply to Inquiry Response indicating completion of review and upload.



# Proposed PBA Process (cont'd)

## ➤ FCC Responsibilities

- Review TCB approved Form 731 and applicable information for consistency with guidance.
- Modify application to permit Grant.
- Inform TCB via PBA KDB Inquiry Tracking number that application is acceptable for Grant.
- Delete applications not granted within 30 days of initial upload.



# PBA Special Circumstances

- Permissive Changes
  - FCC KDB correspondence not required if original guidance continues to apply to the current application.
  - TCBs need to ensure the guidance continue to apply
- Change in ID
  - Original Grantee, no additional documentation required.
  - New Grantee, must document concurrence of the original Grantee.
- Previously Issued KDB Guidance
  - Acceptable to apply to a “new” device of same Grantee
  - KDB Inquiry Number must be identified
  - Documentation of applicability of the new device to the previous guidelines must be provided by the test firm, manufacturer, etc.
  - Test firms may only use guidance issued to a grantee who is not the applicant after submitting justification and a description of the applicability of the guidance to the new device to the FCC; and after receiving the approval and concurrence of the FCC
  - TCB must evaluate, review, affirm, coordinate to completion! !



# PBA Special Circumstances (cont'd)

- Confidentiality is critical
  - KDB numbers
  - Proprietary information in KDB Inquiry information
  - Attachments included as part of the KDB Inquiry if considered proprietary
- Upload all of the above into an Operational Description exhibit type as necessary to protect confidentiality.



# Issues / Problems

- Pitfalls not considered?
- Processing problems?
- Roles and responsibilities issues?
- Suggestions for modifications?
- Questions?

*Thank you!*