Modular Approval Discussion

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Review of Guidance for Approval of a Certified Transmitter Module

- Modular approvals will continue to grow.
- Numerous questions lead us to believe that:
  - Confusion and inconsistencies among TCB(s), grantees and hosts manufactures.
  - Some OEM/Integrator have misconceptions on total FCC requirements (No 15B, etc)- no clear guidance on FCC requirements.
- The theme of this presentation is basically boiling down into four areas:
  1. What is a CTM (module).
     - ✓ Certification
     - ✓ Physical Assembly
     - ✓ Instruction Documentation (conditions and terms of use)
     - ✓ Software environment
  2. Responsibility between the
     - ✓ Host manufactures
     - ✓ Grantee
  3. Adequate documented information to transfer this responsibility.
  4. Make it easier for OEM/Integrator to address changes.

Abstract of the Questions

- General Module Certification
  – Should FCC extend marketing collateral and marketing and documentation requirements.
- Permissive Change
  – Marketing one module as stand-alone and limited.
  – What does an OEM do to get grant conditions changed.
- Software Considerations
  – FCC to extend requirements for host software environments
- Grantee's Host Instruction Manual
  – Should the FCC consider an extensive host instruction manual.
- Grantee/ Module Platform-all
  – RF shielding material or paints integrated into or covering RF integrated monolithic circuits. Better definition needed.
- Grantee/Module Platform –Soldered – Trace
  – Question 11 of KDB 996369 are very specific and restrictive, FCC looking for alternatives.
- Grantee/Module Platform –all/ Host Type- Portable – Mobile/ Approved for-licensed-Unlicensed.
  – RF exposure limitations for portable use- Is there a fast track way to let an OEM use a module in violation of the grant conditions.
- Approved for a licensed CTM & Antennas
  – compliance to the antenna and transmission system requirements similar to that of sections 15.203, 15.204(b) and 15.204(c) for unlicensed transmitters.

Comments in A Nut Shell

- Many agreed or did not have major issues for requiring better (extensive strong instruction) documentation and conditions of use and/or terms of use.

- Others- mainly module manufactures- had a strong position that the integrators should be more responsible for compliance of the final products embedding a CTM.

  - Some proposed a new type of registration process or for providing exposure evaluations only reports.

  - A New FCC ID can be submitted by the OEM/Integrator with the ability to add specific test to and reuse information provided by the grantee

- Others issues required an engineering solution.

- Some issues required better clarification and/or new interpretation.

Things we will be looking At

- General Module Certification
  - Should FCC extend marketing collateral and marketing and documentation requirements
- Permissive Change
  - Marketing one module as stand-alone and limited
  - What does an OEM do to get grant conditions changed
- Software Considerations
  - FCC to extend requirements for Host software environments
- Grantee's Host Instruction Manual
  - Should the FCC consider an extensive host instruction manual include

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- Grantee/ Module Platform-all
  - RF shielding material or paints integrated into or covering RF integrated monolithic circuits. Better definition needed
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- Grantee/Module Platform –all/ Host Type- Portable – Mobile/ Approved for-licensed-Unlicensed.
  - RF exposure limitations for portable use- Is there a fast track way to let an OEM use a module when to is in violation of the grant conditions.
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Questions and Answers

Thanks!