

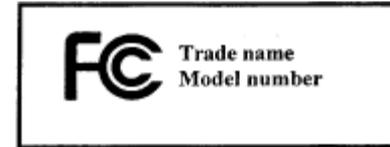
# Equipment Authorization Processing Issues

**TCB Workshop  
October 2016**

Laboratory Division  
Office of Engineering and Technology  
Federal Communications Commission



# DoC and Labeling



- FCC logo applicable only to products subject to authorization under Declaration of Conformity
- An FCC recognized accredited testing laboratory is required to be used when testing products subject to DoC
- §15.19 (b)(3) ... FCCID and/or unique identification and the logo must be displayed on the device
  - §2.925(f) "...an alternative method of positively identifying the equipment may be used if approved by the Commission...proposed alternative method of identification and the justification for its use must be included with the application for equipment authorization."



# User Manuals

- *Is a URL link to the manual sufficient to fulfill the needs of the manual exhibit associated with an application for device certification?* No, §2.1033 (b & c) Application for certification. Requires a copy of the manual or instructions to be submitted with the application.
  - Rules permit draft copy of the instructions may be submitted if the actual document is not available.
  - If a draft is submitted, the final document shall be furnished to the FCC when it becomes available.



# CONFIDENTIALITY

- 388624 D02 Pre-Approval Guidance List - PAG is required to request permanent confidentiality under exceptional circumstances for exhibits that are not typically held confidential.
  - external photos or other exhibits which are normally not eligible for “Long Term Confidentiality”
- As noted in KDB Publication 726920
  - Request for confidentiality for internal photos and/or user’s manual exhibits are special conditions but do not require PAG. – TCB can approve without need for KDB inquiry from the FCC
  - Other circumstances that require a post grant KDB inquiry include:
    - Making an exhibit(s) confidential that is currently publicly available but that qualifies for Long-Term Confidentiality.
    - Reinstating confidentiality for a recently expired Short-Term Confidentiality exhibit. **Not to have exceeded the 180 day limit**



# CONFIDENTIALITY

Exhibits	Long-Term Confidentiality	Short-Term Confidentiality	Request/Special justification/Exceptional
ID Label/Location	No	No	Exceptional
Attestation Statements	No	No	Exceptional
External Photos	No	Yes	Exceptional
Block Diagram	Yes	Yes	Request
Schematics	Yes	Yes	Request
Test Report	No	No	Exceptional
Test Setup Photos	No	Yes	Exceptional
User's Manual	***	Yes	Request/Special justification
Internal Photos	***	Yes	Request/Special justification
Parts List / Tune Up	Yes	Yes	Request
RF Exposure Info	No	No	Exceptional
Operational Description	Yes	Yes	Request
Cover Letter(s)	No	No	Exceptional
SDR Software / Security Info **	Yes	NA	Automatically held Long-Term
	** Automatically held Long-Term Confidential.		
	*** Long-Term Confidentiality may be permitted under special conditions (See II. LONG-TERM CONFIDENTIALITY, Section 3 below. For Internal Photos and Manuals.		



## KDB Publication 388624 PAG Inquiry

- For devices which require pre-approval guidance (PAG) that are composite or have permissive changes where the grantee opts to go to different TCB's for different portions of the device, it is the responsibility of the grantee to provide all TCB's the guidance the FCC has provided for the device so that the TCB's can properly review the application
  - The grantee should not provide the KDB inquiry number associated with the KDB to multiple TCBs
  - Each TCB involved will be required to open up their own PAG KDB. Note that review time at the FCC will be reduced if all of the original inquiry content is provided to the FCC
  - If one TCB handles multiple portions of the composite application or original grant with permissive changes, they may re-open the original PAG inquiry for each additional application under the FCCID that requires PAG. All other TCBs must submit the PAG through their own PAG KDB inquiry number



# Tune up procedure

- 2.1033(c)(9) Tune-up procedure over the power range, or at specific operating power levels.
  - Address any special component requirements for final RF output device capability.
  - Describe any tune up procedure to be done by the user or installer of the unit.
  - May also include for example device setup and configuration information needed or used for testing.



## Filing Issue – Scope A1/A2 Frequency Range

- When a device operating under one equipment class operates above and below 1 GHz the filing system prevents the grant from being issued due to scope validity checks
  - System update planned to resolve
  - Short term resolution - TCBs issue grant for frequency range above 1 GHz under scope A2 and submit a KDB to FCC requesting that the FCC add a line entry to grant for frequency below 1 GHz.
    - KDB inquiry should provide full line entry data including rule parts, note codes, frequency, etc.



# Questions and Answers

**Thanks!**