



Administrative

Presenter: Jim Szeliga
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Administrative Subjects

- Publications Updated.
- Confidentiality.
- Importation, Marketing and Operation 2.803 & 2.805 Prior to an Equipment Authorization.
- Multiple PAGs.
- Suppliers Declaration of Conformity (SDoC).



Publications Updated

- **388624 Pre-Approval Guidance (PAG)**
 - Added PAG item directional antenna gain measurement procedure from Publication 662911.
- **285076HAC Interim procedure Updated.**
- **662911 Measurement of Transmitters with Multiple Output, MIMO, Smart Antenna. Was a draft for comment and is now a final publication.**
 - Included new directional antenna gain measurement procedure.
- **680106 Wireless Power Transfer (WPT)**
 - Update requirements for WPT below 100 KHz.
 - Clarification using multiple coils
 - Now available as a draft publication for comment
- **996369 Modules, Module Certification, 15.212**
 - Frequency of investigation
 - Investigation for Individual Rules vs. Composite Investigation (5X)



Confidentiality

- §§ 0.457(d) and 0.459 of the FCC rules provide the authority for allowing confidentiality to be requested.
- A grantee can not request long term confidentiality for:
 - Information generally known to the public.
 - Information the grantee does not hold confidential.
- Short term confidentiality can only be issued for a maximum of 180 calendar days from the date of the grant. No special provisions for covid-19.
 - Alternative is to dismiss application and refile later.



Confidentiality

KDB Publication 726920

Exhibits	Long-Term Confidentiality	Short-Term Confidentiality
ID Label/Location	No	No
Attestation Statements	No	No
External Photos	No	Yes –Max 180 days
Block Diagram	Yes-Justification Required	Yes –Max 180 days
Schematics	Yes-Justification Required	Yes –Max 180 days
Test Report	No	No
Test Setup Photos	No	Yes - Max 180 day
User’s Manual	* or Special conditions	Yes - Max 180 days
Internal Photos	* or Special conditions	Yes - Max 180 days
Parts List/Tune Up	Yes-Justification Required	Yes –Max 180 days
RF Exposure Info	No	No
Operational Description	Yes-Justification Required	Yes –Max 180 days
Cover Letter(s)	No	No
SDR Software/Security Info	Yes Automatic	Yes Automatic



Long Term Confidentiality

● When a PAG is not required:

- Special consideration for internal photos or user manuals:
 - Internal photos:
 - Circuit board or internal components are clearly not accessible to users, enclosed in epoxy, etc.
 - Also, it is acceptable if the device is not accessible to the public with an NDA to be filed with the application.
 - User Manual. When intended for professional technicians obligated under an NDA to be filed with the application.

● When a PAG is required:

- Internal photos & user manual can not meet epoxy requirement or provide NDA.
- Establishing confidentiality for exhibits that are/were public. A letter is required that the grantee understands that the information was public and may be available on third party web sites.
- Exceptional circumstance is any request outside of what is permitted in KDB 726920.



Importation, Marketing & Operation Prior to an Equipment Authorization

- A. Import conditions prior to an equipment authorization:
 - §2.1204 (a)(3) testing and evaluation $\leq 4,000 >$ KDB 741304.
 - §2.1204 (a)(4) industry trade shows $\leq 400 >$ KDB 741304.
 - 740 no longer required, importer needs to know the rule (**if inspected**).
- B. Limited marketing §2.803:
 - Only permitted for devices that can be authorized.
 - Conditional sales permitted but not deliverable until authorized.
 - Signage & advertising “ This device has not been authorized.....”
 - Developmental Kit can be sold to professionals.
 - Market trials permitted under Part 5 subpart I & H with Experimental License.
 - Operation of device permitted under 2.805.
- C. Operation §2.805:
 - Not a field trial (evaluation, marketability, equipment demonstration, authorization, not in end users hands)
 - Parts 15, 18 & 95.
 - License devices: licensee’s authority or Experimental license.
 - Field trial (end users) contact Experimental License Branch



MPAG

- Multiple Pre Approval Guidance (PAG) Items under one KDB Inquiry Tracking Number.
- MPAG when submitted by a TCB (via a TCB Login)
 - First category : **PBA** (old “Permit But Ask”) **Submittal:**
 - Second Category:
 - ~~DFS~~
 - ~~EMC (PBA)~~
 - ~~SAR/MPE (PBA Submittal)~~
 - **Use Special Circumstances (Multi-PAG, HAC, Other)**
- In all 731 applications associated with that FCC ID enter the KDB tracking number Inquiry and check “YES” for related to KDB Inquiry.
- TCB is prohibited from issuing grants for devices requiring PAG until FCC approves.



MPAG

1. List all the PAG items and identify them by section from KDB 388624 (PAG list).
2. Identify where the information is, especially if it is contained inside another document.
3. If you are going to include additional information just for information purpose only, Please indicate clearly.
 1. For example: Already approved items for Reuse are not required to be in the PAG. If noted clearly that it has been seeded (previously approved) and not part of this MPAG.
 2. Applicable Inquiry numbers related to the same item.
4. MPAG may be divided up and handled in parallel by different staff.



“Fast Track” MPAG Processing Tool

ISSUE

- MPAG process may benefit from a more structured, uniform format, **leading to reduced** time for identifying and collecting the information required for the FCC review

CONCERN

- Inefficient use of engineering team resources
- Increased risk of missing relevant information

PROPOSED SOLUTION

- A compact, “one-stop” summary table, with a sequentially organized information flow to guide and **streamline the FCC review process**



MPAG Summary Table

- Organizing MPAG Submission data for faster processing and tracking
- Filed with MPAG KDB Inquiry
- Compact summary for all MPAG info:
 - what are the actual items under PAG
 - which EAS TC number(s) each item refers to
 - where in the TC sections the relevant exhibit(s) is/are
 - where in the exhibit (sections or pages) the items to review are located
 - remove or clearly mark non-MPAG relevant information

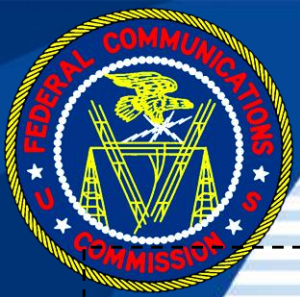
Example

MPAG KDB Inquiry: 123456						
FCC ID: ABC-D1234E						
PAG Item Description	Pub. 388624 Reference	Equipment Class Code	TC number	Exhibit Category	Exhibit Description	Notes
RFX simulations for WPT	II.A.3	DCD	TC654321	RF Exposure	ABC_RFX_WPT_rev2	See Sections 1.1 1.4, Appendix
Time averaging SAR procedure	II.C.1.g.	DSS	TC112233	Operational Description	AvgSAR_DSS_rev1	See Section 2 and Table 3
Time averaging SAR procedure	II.C.1.g.	DTS	TC445566	Operational Description	AvgSAR_DTS_rev3	See Section 1.3.1



Supplier's Declaration Conformity (SDoC)

- SDoC is an equipment Authorization procedure permitted for certain devices by rule.
- Any device subject to SDoC has option to use Certification, §2.906.
- KDB 896810 provides Guidance for SDoC.
 - SDoC is not limited to Part 15B unintentional radiators.
 - See Appendixes in 896810 for Part 18, & specific transmitters Parts: 73, 74, 80, 87, 90, 101.
 - For example: §90.248, buoy and wildlife tracking transmitters operating in the band 40.66-40.70 MHz or 216-220 MHz.



Supplier's Declaration Conformity (SDoC)

Responsible Party (Manufacturer, US Importer)
working with test lab or their own internal lab (if capable).
Note accredited lab is not required.





Supplier's Declaration Conformity (SDoC)

- When SDoC and Certification are used for a composite device, all labelling, user information, and retention of records and Part 2 subpart J requirements apply to both SDoC and Certification.
 - SDOC must
 - Test report signed by responsible party or in behalf of the responsible party. 2.938 (b) (10).
 - Maintain compliance records §2.938 (b) and provide only if FCC request them.
 - There is no official FCC SDoC declaration or statement or FCC form.
 - Responsible Party must be in the US.
 - Provide 2.1077 information to user (US address, Contact info, compliance information).
 - FCC Logo is optional.
 - Compliance statement.(15.19)
 - Certification
 - Label FCC ID
 - Compliance statement(15.19)
 - Keep grantee contact information up to date in EAS (Contact, company name change, transfer of control)



Supplier's Declaration Conformity (SDoC)

- Assembled, Racked and Composite systems
- §15.101 (b) (4) Permits personal computers to be assembled from authorized motherboards, power supplies, peripherals tested in accordance with §15.102(b) without final testing of the assembly plus an SDoC compliance statement in accordance with §2.1077 (b).
- Assembled (factory or on site) products that are not personal computers:
 - The resulting final assembled system must comply with the applicable regulations and authorized under SDoC (or Certification).
 - Testing rules: §15.31(j), (i), (k) and 2.947 (f) for external accessories and a composite system.
 - This includes components such as: power supplies, monitors, controllers.
 - Changing or adding different power supplies and components, the assembled system must be re-tested and is subject to meeting Part 15 limits under the SDoC procedure.
 - Note: there have been major interference cases from assembled lighting and electronic signs, trusting subassemblies with FCC logos and not testing final device.
 - ANSI C63.29 standard in draft is to address assembled lighting devices.



**Questions?
Thank You!**