



# Administrative Topics

**Laboratory Division**  
**Office of Engineering and Technology**  
**Jim Szeliga**



## Administrative Topics

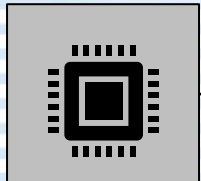
- Administrative: KDB tidbits:
  - Category selection
    - ✓ ex Supersede/Audit Mode
      - FCC Audit Request
      - TCB Audit Request
  - Not indicated/signed in as TCB, but inquiring about TCB related concerns.
  - 3GPP vs Rules: FCC Rules Rule.
  - Upfront test report summary results.
- Module review and a response to TCB Council question.
- R&O rule (FCC 21-72, not effective) for importation & marketing prior to an equipment authorization.



# Module Review

Grantee

Host Integrator



Product A



Model A

- Instructions
- RF Exposure

Certification Under 15.212 For a completely self-contained transmitter

Contains FCC ID: Host uses the certification for compliance to that transmitter.

**⊘ C2PC for that transmitter by the Host integrator is not a procedure.**

C1/C2 PC Software/

Version v2

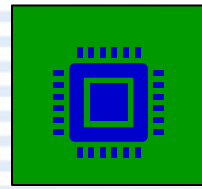


KDB Pub 594280

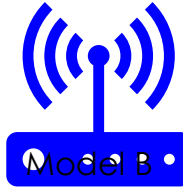


Product A +

C2PC & New Model



Model B



Product B ++  
Whatever



## TCB Council Questions

Q1. When changes are made to the transmitter chips how does that effect the integrators?

- Software Changes may be pushed in accordance with KDB Pub 594280.
- Hardware changes under a C2PC with a new model host can use the new model.

Q2. If for example, if the chip manufacturer made a change to an RF filter, creates a new model/part number: and obsoletes the original, how does this effect the integrator?

- Integrator can use the new Model Part. (C2PC do not apply to the integrator).
- Option, Integrator treats it as a component, does his own RF filter: integrator can get a certification for his product.



## TCB Council Questions

Q3. Assume the host used the transmitter and it was part of the main PCB (i.e., not a separate (meaning plugin) chip, the change would fall under a class 2 permissive change.

✓ No. Only the grantee can do a C2PC.

Q4. Because the transmitter is a chip, this would technically “constitute an entire transmitter” so is the integrator required to obtain a new FCC ID?

✓ Chip or daughter board does not make any difference.

✓ Find a new module or use Option Q2. Obtain a new FCC ID.

Q5. Another example is a change in memory, something unrelated to the transmitter is a class 1 change, but again, for the integrator does this constitute an entire transmitter and require a new FCC ID?

✓ integrator can use the new memory module.

Other options giving more control to the host integrator (i.e., become the Grantee).

✓ The host Integrator, has the option to do a Change-in id, if permitted, and assume responsibility: then do a C2PC to the new change-in id FCC ID.

✓ Host integrator can use the CHIP as a Part—and get an FCC ID for the entire product.





## § 2.803 Pre-Marketing & § 2.1204 Importation Rules Prior to an Equipment Authorization

- FCC 21-72 to become effective upon approved by the Office of Management and Budget. No effective date announced for § 2.1204 (a) (11) and § 2.803.
- § 2.1204 (a) (11) Importation prior to an equipment Authorization-certification only.
  - 1) Importation of 12,000 RF devices (same FCC ID) for pre-sale activity under 2.803.
    - ✓ A greater number of units may be permitted if requested and justified. KDB 741304 ( request to exceed number) will be modified to reflect § 2.1204 (a) (11) when rule becomes effective.
  - 2) Importation is contingent upon completed testing by an FCC-recognized accredited testing laboratory and application for certification has been submitted to a TCB.
  - 3) Externally-visible temporary label *“This device cannot be delivered to end users, displayed, or operated until the Federal Communications Commission FCC 21-72 device receives certification from the FCC. Under penalty of law, this label must not be removed prior to receiving an FCC certification grant”*.



## § 2.803 Pre-Marketing & § 2.1204 Importation Rules Prior to an Equipment Authorization

4. Externally-visible temporary label *“This device cannot be delivered to end users, displayed, or operated until the Federal Communications Commission the device receives certification from the FCC. Under penalty of law, this label must not be removed prior to receiving an FCC certification grant”*. FCC 21-72 .
5. Device must remain under legal ownership of the responsible party: manufacturer, developer, importer or ultimate consignee, or their designated customs broker.
6. Recordkeeping requirement for enforcement – for example revoke certification- or other purposes for a period of sixty (60) months identifying the recipient of devices imported for pre-sale activities.



## § 2.803 Pre-Marketing & § 2.1204 Importation Rules Prior to an Equipment Authorization

- § 2.803 Changes:
  - Expand conditional sales, and advertisements for such sales, to include consumers.
  - Providing appropriate notifications, disclosures and labelling to buyers;
    1. Notification that the equipment is subject to the FCC rules and delivery to the end user is conditional upon successful completion of the applicable equipment authorization process.
    2. Notification that FCC rules do not address the applicability of consumer protection, contractual, or other provisions under federal or state law.
    3. Notification of any responsibility of the initiating party to the buyer in the event that the applicable equipment authorization process is not successfully completed, including information regarding any applicable refund policy.
  - Retrieval and Tracking of Unauthorized Devices is required if the equipment is not successfully certified and must be retrieved.





# Questions and Answers

**Thanks**