



# **Equipment Authorization Market Surveillance Overview**

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# Market Surveillance Overview

- Multipoint Approach to ensuring products comply
  - TCB market surveillance
    - See KDB 610077
      - <https://apps.fcc.gov/oetcf/kdb/forms/FTSSearchResultPage.cfm?id=20540&switch=P>
  - FCC market surveillance
    - Review of electronic documents submitted to 731 Application
    - Sample testing
      - Devices with high potential of non-compliance
      - New types of technology
      - Batches of products from a specific product type
      - Random
      - Result of electronic review findings
  - Complaints
    - Public, TCBs, Test Labs, competitors, other stakeholders
    - FCC investigates every complaint received



# Non-Compliance Issues

- Administrative vs Technical non-compliance
  - Each issue handled on case-by-case basis
- General Steps
  - Validate complaint
  - Determine scope of non-compliance
    - One-time single issue or reoccurring issue
  - Determine root cause
  - Contact parties involved and give them opportunity to explain and resolve issue
  - Determine corrective action(s)
  - Verify issue(s) resolved
  - Monitor future submissions to ensure continued compliance



# Non-Compliance Issues II

## ● Validate non-compliance

- If the issue is identified by FCC electronic review, the FCC may verify by requesting a sample or purchasing a sample for FCC testing.
- If the issue is identified in TCB market surveillance and TCB is unable to resolve the issue with grantee, the FCC may contact the grantee, agent, test firm or other associated party for explanation and/or sample



# Non-Compliance Issues III

## ● Validate non-compliance

- If a complaint is received from other party:
  - FCC will review complaint to see if it is justified
    - FCC regularly receives complaints where complaining party doesn't understand requirements and devices comply
  - FCC may review entire authorization to determine if there are other unreported issues
  - If it appears that issue reported accurately identifies non-compliance with the FCC requirements:
    - FCC will verify which requirements were not met and contact responsible party to resolve
      - » Responsible party could be Grantee, TCB or Test Firm or all three
    - FCC may request test sample of device or direct sample to TCB for testing
    - FCC may expand review to determine if issue is isolated case or broader





# Non-Compliance Issues IV

## ● Non-Compliance-Next Steps

– FCC Lab may:

- Notify FCC Enforcement Bureau to issue Notice Of Apparent Liability (i.e., fine)
- Defer grantee code to manage future filings from grantee
- Audit similar applications
- Require new test report for device
- Require accreditation body review issue with TCB or Test Firm to ensure procedures have been implemented to prevent future issues
- Require responsible party to provide updated procedures to the FCC and evidence of training of employees
- Remove entity recognition
- Apply PAG process to entity for similar submissions



# Questions and Answers

**Thanks**