



December 13, 2013

VIA E-MAIL TO INNOVATION@FCC.GOV

Ms. Diane Cornell  
Special Counsel  
Office of the Chairman  
Federal Communications Commission  
445 12th Street, S.W.  
Washington, DC 20554

Re: A Call for Input: Improving Government Efficiency at the FCC

Dear Ms. Cornell:

This is to follow-up on Motorola Mobility's proposals to you for ways to streamline the FCC's type approval procedures. We understand that you see this input as a first step that will be followed by more extensive work with multi-player stakeholders (such as trade associations) that will gather data and prepare more extensive and detailed proposals.

Our list of proposals include three that would constitute substantive changes in the FCC's approach to approvals, one that calls for review, and three that would call for administrative changes. The list follows:

### Items Calling for Fundamental Changes

1. **Pilot Program for Self-Declarations of Compliance.** Self-Declarations of Compliance are used in other parts of the world, notably in the EU. Examination of the pros and cons of utilizing such an approach for some of the FCC's approvals could aid efficiency and point to fundamental changes in approach that could effectively streamline the FCC's approval process. Various approaches are possible:
  - a. Pilot a subset of standard WiFi products;
  - b. Pilot a subset of handsets -- e.g., products that could be approved by a TCB without a PBA.
2. **Elabeling.** Motorola Mobility, together with has been promoting the advantage of elabeling for more than a year. Indeed, TIA filed a petition for rulemaking for elabeling in August of 2012. Given the current state of technology, elabeling is ripe for adoption around the world. Motorola Mobility therefore advocates a two-

Motorola Mobility  
1101 Enterprise Way  
Washington, DC 20005  
ceger@motorola.com  
202-253-2200



pronged approach: that the FCC issue an NPRM for labeling and, in parallel, conduct a pilot program to determine the most useful techniques for labeling.

- 3. FCC ID.** The FCC ID definitions and requirements contain anomalies that should be addressed. For example, if a device is approved that contains several technologies (e.g., CDMA, GSM) the device can keep the same FCC ID if some of the bands are turned off by means of software. However, if those same bands are removed during manufacturing a new FCC ID is required. Motorola Mobility proposes that these kinds of anomalies be address by revising the requirements for an FCC ID and permitting the following scenario: Approval of a device containing all possible bands under one ID with the possible variations able to use the same ID provided compliance levels are maintained.

#### **Item Calling for Additional Review**

- 4. Review Status of TTY.** TTY has been recognized by the FCC as an important means of providing users with access to mobile telephony. It would be beneficial to periodically conduct reviews to determine if technological alternatives have been developed that can better meet the needs of current TTY users.

#### **Items Calling for Administrative Changes**

- 5. Default Filing Confidentiality.** Automatically set the expected levels of confidentiality on applicable exhibits, relieving the applicant from doing so, and preventing unintended information “leaks” due to human error.
- 6. HAC approvals for ANSI C63.19-2011.** Currently every device measured with the 2011 version of the HAC standard can only be approved by a TCB via the PBA process. This is unnecessary for products without VoLTE, which products should be fully within the scope of TCB authority
- 7. Annual HAC filing website improvements.** We recommend that the WTB website for annual HAC filings (<http://wireless.fcc.gov/hac/index.htm?job=home>) provide submitters with a copy of the previous year’s report to edit rather than require such data to be re-entered. This would enhance the accuracy of the database by reducing typos.

We appreciate the opportunity to make these proposals and look forward to working with the relevant trade associations and the FCC on fleshing out and developing the proposals.

Regards,  
/s/ Charles Eger  
/s/ Melissa Glidden Tye  
Motorola Mobility

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Washington, DC 20005  
ceger@motorola.com  
202-253-2200