Equipment Authorization Administrative Issues
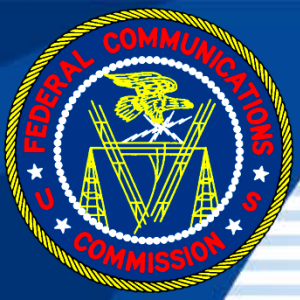
TCB Workshop
October 2014

Laboratory Division
Office of Engineering and Technology
Federal Communications Commission

Topics

- Exclusion List and PBA List and Procedures
- General Issues
- Conformity Assessment KDB updates

TCB Exclusion List

TCB Exclusion and PBA List Updates

- TCB Exclusion List (KDB 628591) items move to PBA List (KDB 388624)
  - Effective date April 10, 2014
  - All current Exclusion List items moved to PBA
  - The exclusion list remains active for possible items in the future

PBA List (KDB 388624 D02) Changes

- Three Classes of PBAs

  – Devices subject to special conditions where the authorization procedures to be used must be approved by the FCC prior to PBA submittal

  – Devices for which a sample must be submitted to the FCC for pre-approval testing as part of the PBA process

  – Devices subject to PBA review prior to approval by a TCB

PBA List (KDB 388624 D02) Changes

- Added:
  - All Exclusion List items

- Removed
  - Implanted transmitters with maximum total available output power < 1.0 mW
  - Doppler radars operating in the 24.05 GHz to 24.25 GHz frequency band or 70 GHz (Part 90 Subpart F).

PBA List (KDB 388624 D02) Changes

- Removed
  - Filings for CMRS industrial boosters (eqpt. class B2I) not in accordance with Sec. 20.21 and the latest KDB Pub. 935210 provisions.
  - When Release 8 Long Term Evolution (LTE) devices cannot satisfy the specific conditions required by KDB Publication 941225 D05

TCB Permit But Ask Procedure

- KDB 388624
  - Devices requiring approval of procedures prior to PBA
    - Primarily cases where the Commission must make the determination on compliance with FCC Rules.
    - Commission review must be complete before submittal of PBA
    - Guidance from Pre-PBA KDB must be included in the 731 filing. KDB guidance should be placed in Operational Description exhibit if confidentiality is desired
  - Devices for which a sample must be submitted to the Lab for testing as part of PBA process
    - Samples must be submitted for independent FCC testing
    - Samples are only to be submitted upon request
    - Lab may waive sample submittal at its discretion

TCB Permit But Ask Procedure

- KDB 388624 (Cont.)
  - Devices subject to FCC review prior to approval by a TCB
    - Processed under current PBA procedures
    - No changes to those procedures
- Elimination of Exclusion List further increases importance of PBA
  - It is incumbent upon TCBs to be familiar with the PBA list and to correctly implement PBA procedures
  - Failure to follow PBA procedures is a serious infraction and may result in a report to TCB accreditor

Further Administrative Items

- Major Guidance Publication to be replaced by Publication Index
  - List of all publications
  - Page content and format under discussion
- KDB publication content review
  - FCC review all published KDBs
    - Minor edits and weblink updates will be republished under original publication date
    - Other changes will be published with current date
- Equipment Class Changes
  - Level probing radar (LPR) equipment class added
  - Exclusion list equipment classes will be unblocked
- Phablet Equipment Classes
  - Handsets/Phablets with held-to-hear, PCE
  - Tablets/phablets without held-to-ear function and tablets greater than 20 cm diagonally with held-to-ear , PCB
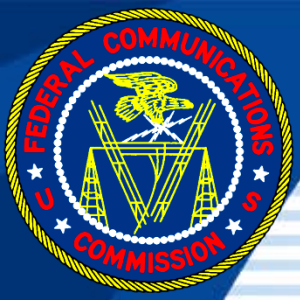
Further Administrative Items 2

- FCC is considering creating new equipment classes for specific devices

- When rulemakings address adding new equipment classes to grants the rulemaking describes the additions as permissive changes because they are permissible under the rules but the filing system handles these changes similar to original grants
  - Procedure for adding a new equipment class to FCCID where original grant was FCC issued:
    - If FCC issued original grant as composite just add new equipment class original grant under same FCCID
    - If FCC issued original grant as an software defined radio (SDR) just add new equipment class as a Class III permissive change under same FCCID
    - If FCC issued original grant as non composite contact the FCC to set aside and modify original grant
      - After FCC action TCB can grant with new equipment class under the same FCCID
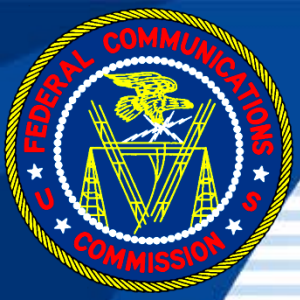
Further Administrative Items 3

- Procedure for adding a new equipment class to FCCID where original grant was TCB issued:
  - If TCB issued original grant as composite just add new equipment class as original grant
  - If TCB issued original grant as SDR device just add new equipment class as original grant
  - If same TCB issued original grant less than 30 days ago as non composite, TCB can modify original grant to composite and then issue new equipment class grant as original grant
  - If same TCB issued original grant as a non composite more than 30 days ago, contact the FCC via KDB to put original application in audit mode and then the TCB should modify original grant to composite and then issue new equipment class grant as original grant
  - If different TCB issued original grant as a non composite the grantee should contact original TCB to modify original grant to composite and then any TCB can file the new equipment class grant as an original grant

Further Administrative Items 4

- Part 90 Line entry updates reminder
  - Before submitting KDB for FCC to correct a line entry blocked improperly by filing system:
    - Verify requested change is allowed under rules
    - Grant application with proper note codes and rule parts prior to requesting correction
    - Submit request only through KDB and not directly to FCC email.

Conformity Assessment KDB Updates

- 641163-TCB Roles and Responsibilities
- 668797-TCB Technical Assessment Checklist
- 974614-Accredited Testing Lab Roles and Responsibilities
- 610077-TCB Post Market Surveillance

641163-TCB Roles and Responsibilities

- 641163 Changes
  - Updated to include references to ISO/IEC 17065 (2012)
  - Modified Key Employee Guidance
  - Updated web links
  - Added ISO/IEC 17065 transition clause
  - Added requirements for accredited lab assessment to C63.19 hearing aid compatibility requirements
  - Removed reference to TIA-968-A
  - Updated information on contract employees/external resources and outsourcing
  - Clarified requirements for evaluation, review, and decision on certification

668797-TCB Technical Assessment Checklist

- 668797 Changes
  - Incorporated references to ISO/IEC 17065
  - Added KDB references where applicable
  - Corrected rule parts names to account for CFR name changes
  - Added questions to account for new technology since last update
  - Added questions to account for TCB knowledge of FCC administrative processes and procedures

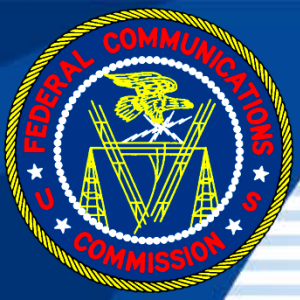# 974614-Accredited Testing Lab Roles and Responsibilities

- 974614 Changes
  - Added new accreditation body information for Laboratory Accreditation Body (L-A-B)
  - Updated accreditation body contact information
  - Updated website addresses
  - Corrected various typographical errors

610077-TCB Post Market Surveillance

- 610077 Changes
  - Removed EASADMIN@FCC.GOV from procedures
  - Added follow up action procedures for samples not received
  - Incorporated references to ISO/IEC 17065

Questions and Answers

Thanks!