

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

In the Matter of	)	
	)	
Office of Engineering and	)	
Technology Seeks Comment On	)	ET Docket No. 19-48
Modifying the Equipment Authorization	)	
Rules to Reflect the Updated Versions	)	
Of the Currently Referenced	)	DA 19-152
ANSI C63.4 and ISO/IEC 17025	)	

To: The Commission

**Comments of Hewlett Packard Enterprise**

Hewlett Packard Enterprise (HPE) is grateful and honored for the opportunity opened on commenting on the important Notice of Proposed Rulemaking proceeding. HPE submits these comments in response to the Notice of Proposal Rulemaking issued by Federal Communication Commission Office of Engineering and Technology (OET) captioned proceeding of incorporating ANSI C63.4a-2017 and ISO 17025:2017 into FCC rules and procedures. HPE manufactures and sells unintentional/intentional radiators that are subject to the new proposed rules and procedures under review in the proceeding.

After close consideration and review, HPE supports the implementation and incorporation of ISO/IEC 17025:2017 requirements for Testing Laboratory Qualifications. HPE welcomes the Commissions (FCC OET) changes to the Testing Laboratory FCC qualifications and guidelines. HPE recognizes the ISO/IEC 17025:2017 lab accreditation will improve, develop and

promote the HPE quality operations to assure services supplied by HPE testing facilities will be accurate and reliable. HPE thanks the FCC for the considering the international standard.

**After close consideration and review, HPE opposes the implementation and incorporation of ANSI C63.4a-2017 into the FCC rules and authorization procedures.** Even though HPE applauds the Commission (FCC OET) on considering the implementation of the new standard ANSI C63.4a-2017, which will modify several elements in the current standard related to NSA (Normalization of Site Attenuation), the new standard will affect global organizations such as HPE. The new standard implementation will require unwarranted extra qualifications to satisfy international and also United States domestic regulatory requirements.

Current FCC rules and procedures specify test site validation for radiated emissions measurements at frequencies above 1000 MHz to comply with the site validation requirements specified in ANSI C63.4-2014 (Clause 5.5.1), such that the validation criteria stated by CISPR 16-1-4:2010-04 is satisfied. Since Normalised Site Attenuation (NSA) for radiated emissions measurements below 1000 MHz can be measured in accordance with CISPR 16-1-4, HPE proposes the Commission (FCC OET) consider the allowance of an International site validation Standard for NSA. Alternatively, HPE recommends the FCC OET to consider waiting for the full adoption of the new draft ANSI C63.4 currently being evaluated by C63 committee.

Regardless, HPE recommends an adequate transition period of at least 3 years to allow feasible time to devise necessary actions towards ANSI C63.4a.

We thank the Commission for the opportunity to openly share HPE comments. HPE is looking forward to the Commissions (FCC OET) output on the comments submitted regarding this proceeding with consideration to the concerns and solutions mentioned.

Respectfully submitted,  
Hewlett Packard Enterprise

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