

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)	
ANSI C63.4 and ISO/IEC 17025)	

COMMENTS OF THE INFORMATION TECHNOLOGY INDUSTRY COUNCIL (ITI)

The Information Technology Industry Council (ITI)¹ welcomes the opportunity to provide comments to the Federal Communication Commission’s Office of Engineering and Technology (OET) on its request for comment on updating FCC rules and procedures to reflect recent changes to ANSI C63.4 and ISO/IEC 17025 standards.² ITI appreciates that the OET is following the Commission’s rulemaking process in seeking input from stakeholders on the impact of these proposed changes to determine whether the changes should be effectuated in its rules.

ITI supports the incorporation of ISO/IEC 17025 into the FCC’s rules and opposes the incorporation of ANSI C63.4a-2017 into the FCC’s rules.

¹ ITI is the premier voice, advocate, and thought leader for the global information and communications technology (ICT) industry. Our member companies include the world’s leading innovation companies, with headquarters worldwide and value chains distributed around the globe. We advocate on behalf of our members for policy and regulatory environments that enable innovation and maximize all of the benefits that ICT companies provide, including economic growth, job creation, and the tools to solve the world’s most pressing social, economic, and environmental challenges.

² ANSI C63.4a-2017 “American National Standard for Methods of Measurement of Radio-Noise Emissions from Low-Voltage Electrical and Electronic Equipment in the Range of 9 kHz to 40 GHz, Amendment 1: Test Site Validation” and ISO /IEC 17025:2017(E) “General requirements for the competence of testing and calibration laboratories.”

ITI supports regulatory approaches that are risk-based and address a demonstrated, real-world need. In addition, given the global nature of the information and communication technology (ICT) industry, we believe that regulatory requirements (or lack thereof) should reflect alignment with international norms and best practices. Accordingly, we applaud the Commission for adopting accreditation requirements under ISO/IEC 17025:2017(E), which improve upon the globally accepted standard for the accreditation of Certification Bodies and Testing Laboratories under ISO/IEC 17025:2005(E). As the Commission notes, “In addition to adding a definition of ‘laboratory,’ this version replaces certain prescriptive requirements with performance-based requirements and allows for greater flexibility in satisfying the standard’s requirements for processes, procedures, documented information and organizational responsibilities.” ITI also believes that these updates to FCC Part 2 rules should align with the three-year transition period to ISO/IEC 17025:2017(E), as supported by ISO and ILAC.³

For the same reasons that ITI supports adoption of ISO/IEC 17025 changes by the FCC, ITI opposes the incorporation of ANSI C63.4a-2017 amendment into FCC rules for measurement procedures for unintentional radiators. ITI is not aware of any EMC/EMI problems in the field resulting from industry’s current measurement procedures for ICT equipment. Furthermore, ITI urges the Commission to consider the impact of adopting ANSI C63.4a-2017 on labs that are currently working to authorize unintentional radiators according to the Commission’s Certification or SDoC procedures. This impact may include the creation of significant costs from having to redesign chambers, recalibrate antennas, purchase new antennas, make other changes to test procedures, and update scopes of accreditation. These costs would come without any demonstrated impact to actual emissions measurements and without resolving any other real-world emission issues of which ITI’s member companies are aware. Furthermore, U.S. companies wishing to compete in both the domestic and international markets must contend with unique FCC requirements and undergo expensive testing or lab verification

³ “ISO and ILAC recently issued a joint communique that re-confirms that a three-year transition period will be allowed for accredited laboratories to transition to the 2017 version of ISO/IEC 17025.9 While both ISO/IEC 17025:2005(E) and ISO/IEC 17025:2017(E) will be valid during this three-year transition period, accreditations to ISO/IEC 17025:2005(E) will become invalid after November 30, 2020.” *FCC Public Notice DA 19-152, April 2, 2019, p2.*

suitability testing twice (e.g. for site attenuation measurements). U.S. companies desire a single product design for the world that is competitive overseas. Foreign companies producing for foreign markets only are not handicapped by the additional requirements of C63.4a.

Provision of alternative measurement options and adequate transition period

Should the Commission decide to move forward with incorporation of the ANSI C63.4 amendment, ITI urges it to accept alternative test site acceptance procedures that reflect current international norms and best practices for labs working to certify unintentional radiators. CISPR 16-1-4:2010 provides test site acceptance that meets the goals of the Commission and allows domestic labs and manufacturers to compete internationally and is already referenced by the Commission for test sites used for testing radiated emissions at frequencies between 1 and 40 GHz. Any modifications to test site acceptance procedures that may be incorporated into future editions of CISPR 16-1-4 should be adopted by the Commission on a schedule synchronized with adoption by other major countries worldwide.

A new version of C63.4 is being drafted by C63 that will contain the requirements of C63.4a along with other changes. C63 indicated that this new version might be published this year⁴ and even if this schedule is optimistic, a new version will be soon published. Lacking a demonstrated problem in the marketplace for unintentional radiators, intermediate adoption of this amendment is not warranted. The Commission should consider waiting for this new version.

If urgent adoption of this amendment is deemed prudent, then manufacturers will need to adjust product designs. Laboratories, independent and otherwise, will also need to perform the work or purchase new antennas to be compliant with C63.4a. In consideration of the above changes, a transition period of at least 4 years for manufacturers and laboratories to adjust should be provided.

⁴ http://www.c63.org/documents/c63/newsletters/C63_Newsletter_Jul_2018_42_Final.pdf

ITI is grateful to the Commission for its consideration of these comments. We welcome any questions on the above and look forward to further discussion with OET on this issue of importance to the ICT industry.

Respectfully submitted,
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