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FEDERAL COMM. COMMISSION  
OFFICE OF THE  
SECRETARY

October 16, 1992

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MAIL BRANCH



Office of the Secretary  
Federal Communications Commission  
Washington, DC 20554

RE: Comments on ET Docket No. 92-152

Dear Ladies and Gentlemen,

I completely agree that the 13dB relaxation of the emissions limits for broadband emissions conducted into the AC power lines should be written into the part 15 regulations. This will make the rules easier to read, reference, and follow. This would also make it easier to adopt newer measurement procedures which may not contain this relaxation.

I agree that allowing use of the CISPR 22 limits for measurements below 1,000 MHz will pose no risk of increased interference. This however is not the full substance of what is needed for harmonization. For an FCC test to have any value overseas, the measurement procedure and test site design must meet that of the overseas authorizing agency. Therefore it is the opinion of the writer that to change the regulations so as to allow use of the CISPR 22 emissions limits alone is worthless. We will all be able to better evaluate the measurement procedure differences when the new CISPR 22 standard is released.

For now we need to maintain tight control of the procedure, and cannot allow all things permitted by CISPR 22. The undefined nature of the CISPR standard may cause foreign labs to submit evaluations using a measurement procedure and report format compliant with CISPR, but not ANSI C63.5-1991. Many foreign companies could send an existing report the the FCC without additional testing. These reports would be in an odd format, and a measurement procedure that is relatively undefined.

In conclusion, if measurements made according to the ANSI C63.5-1991 procedure, and the CISPR 22 limits are useful when presented to foreign bodies, then allowing the CISPR 22 limits as an alternative to part 15 limits has merit. The compatability of measurement procedures may grow as ANSI C63.5-1992 is adopted, and CISPR 22 is revised. A standard reporting format should be established for the CISPR 22 report.

Sincerely,

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