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Federal Communications Commission
Office of the Secretary

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

In the Matter of)
)
Revisions of Part 15) ET Docket No. 92-152
of the Rules to Harmonize)
the Standards for Digital)
Devices with International)
Standards)

COMMENTS

American Telephone and Telegraph Company ("AT&T") respectfully submits the following comments in response to the Notice of Proposed Rulemaking ("NPRM") FCC 92-319, released July 30, 1992.

The NPRM proposes to amend Part 15 of the Commission's rules to permit manufacturers of digital devices to satisfy requirements for radio frequency emissions by compliance with either the FCC standards or the international standards promulgated by the International Special Committee on Radio Interference ("CISPR") in its Publication 22. AT&T supports this proposed change because it will permit U.S. manufacturers who wish to sell globally to avoid the expense and delay they presently experience of testing twice -- once to demonstrate compliance with Part 15 and again with CISPR Pub. 22 for sales abroad.

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The Commission's proposal would create no undue risks of harmful interference in the United States because the international CISPR Pub. 22 emission standards are the same as or stricter than Part 15 except for conducted emissions by devices in the 450-500 KHz band used in commercial or business environments (Class A devices).¹ The principal equipment that could be affected by emissions in that band is the minor category of AM radio receivers used in commercial and business environments. Home usage would not be affected. Moreover, the construction of many business buildings and the types of devices operating there often makes AM radio largely unusable in those buildings.

The Commission also asked for comment on whether it should require use of Part 15 measurement procedures to demonstrate compliance with CISPR Pub. 22 emission limits. The Commission should not adopt such a requirement. Generally, foreign countries using CISPR Pub. 22 require testing using the Pub. 22 measurement procedures. Thus, requiring U.S manufacturers selling globally to test using the Part 15 measurement procedures would once again require

¹ In addition, CISPR Pub. 22 does not limit emissions over 1000 MHz. The Commission appropriately proposes to require compliance with Part 15 standards in this band.

them to test twice which would defeat the purpose of the Commission's proposal.²

The Commission proposes to reference the current First Edition of Pub. 22 and amendments to date, but would not incorporate future changes to Pub. 22 without an additional rulemaking. AT&T agrees with this approach with one modification. The Commission should delegate to the Chief Engineer authority to incorporate future versions and amendments to Pub. 22 that do not make substantive changes.³ Also, the Commission should not require compliance with proposed amendments to Pub. 22 before they are adopted. That would be inconsistent with referencing the existing Pub. 22 rules and would subject U.S. manufacturers to a

² For the same reason, any Commission testing of samples to audit manufacturer compliance with Pub. 22 should be according to the Pub. 22 measurement procedures.

The differences between the two measurement procedures should soon end. The Commission has mandated the use of ANSI C63.4 measurement procedures, effective May 1, 1994. (Procedures for Measuring Electromagnetic Emissions, 7 F.C.C. Rcd. 3128 (1992)). It is expected that the Third Edition of CISPR Pub. 22, planned to become effective around the same time, will adopt the substance of the ANSI C63.4 procedures.

³ For example, the Second Edition of CISPR Pub. 22 is expected to merely combine in a single document the various amendments made to date and referred to by the Commission. The Chief Engineer would be able to incorporate this document when it comes out. The Commission took a similar approach in Measuring Electromagnetic Emissions, *supra*, delegating to the Chief Engineer authority to refer to subsequent versions of ANSI C63.4.

different set of requirements. In addition, as the NPRM notes, such amendments are not always adopted.

Finally, AT&T agrees with the Commission's proposal to move the 13 dB allowance added to the limits for conducted emissions from the measurement procedures to the Part 15 rules. The 13 dB allowance is part of the emissions standards and belongs in the Part 15 standards, not in the measurement procedures.

AT&T supports the proposal in the NPRM as a first step toward harmonization of domestic and international rules. However, the Commission's goal of fostering the international competitiveness of U.S. manufacturers requires total harmonization of CISPR Pub. 22 and Part 15 into a single mandatory set of international emission standards and measurement procedures. Therefore, AT&T urges the Commission to pursue complete harmonization with United States trading partners.

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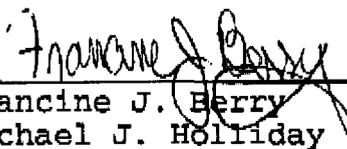
CONCLUSION

The Commission should adopt the proposal in the NPRM in accordance with the modifications discussed in these Comments. The Commission should also work for the development and implementation of a single set of global emission standards and measurement procedures.

Respectfully Submitted,

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