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

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)
)
Revision of Part 15)
of the Rules to Harmonize)
the Standards for Digital)
Devices with International)
Standards)

ET Docket No. 92-152 /

REPLY COMMENTS

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

AT&T and the other commenting parties¹ all support amending 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 Publication 22. Certain issues involving the procedures to measure compliance with the emission limits were, however, raised in the comments.

AT&T and several other parties support requiring use of the Pub. 22 measurement procedures to demonstrate

¹ The Appendix hereto lists the parties who filed comments.

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compliance with the Pub. 22 emission limits.² The proposal of Cardinal and H-P that instead the Commission's Part 15 procedures should be used to measure compliance with the Pub. 22 limits should be rejected. Manufacturers selling globally must test using the Pub. 22 procedures to meet foreign country requirements. The approach urged by Cardinal and H-P would require such manufactures to also test using the Part 15 procedures, thus defeating the purpose of the Commission's proposal to avoid double testing. Furthermore, although those parties claim that the Pub. 22 procedures are not as developed as Part 15, they point to no specific inadequacy in the Pub. 22 procedures. Finally, as both Cardinal and H-P recognize, Pub. 22 and Part 15 measurement procedures are expected to become similar in the near future.³

AT&T and many other commenters supported the Commission's proposal to adopt the Part 15 limits for frequencies over 1000 MHz because Pub. 22 contains no limits in this range.⁴ AT&T agrees with those commenters proposing that Part 15 measurement procedures should apply here where

² AT&T, BT, CBEMA (pp. 5-6), Cray, Tandem.

³ The Third Edition of CISPR Pub. 22 will likely become effective in mid 1994 and adopt the substance of the ANSI C63.4 procedures already adopted by the Commission.

⁴ Amador, AEA, Apple, BT, Capital Cities, Cray, H-P, Silicon Graphics, Tandem, Tandy.

Part 15 limits are involved.⁵ The proposal of several parties to modify Part 15 to adopt the Pub. 22 measurement distance of ten meters instead of the Part 15 distance of three meters is unnecessary and should be rejected⁶. The FCC rules permit testing at different distances and extrapolating the results to three meters.⁷ Therefore, testing can be conducted at ten meters without changing Part 15.

In addition, Cray urged that the Commission continue its practice of accepting measurements of large systems at three representative installation sites as sufficient to establish compliance at other locations.⁸ AT&T supports this proposal. Although the CISPR countries require measurements of these large systems at each site in their respective countries, there is no benefit in requiring U.S. manufacturers electing the Pub. 22 option to measure at more than three sites for United States purposes. Because the three sites to be tested contain types of equipment components and cabling configurations representative of what will be used at other locations, the other locations should have similar emissions characteristics.

⁵ Amador, Apple, CBEMA (p. 8), Cray.

⁶ AEA, H-P, Silicon Graphics, Tandy.

⁷ 47 CFR § 15.31(f).

⁸ 47 CFR § 15.31(d). This rule applies to equipment that can only be measured at the installation site.

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Finally, Amador proposes that a single radiated emissions test be required with the power supply operating at 60 Hz, rather than separate tests at 60 Hz for the United States and 50 Hz as required in the CISPR countries. AT&T agrees with Amador that only one test is required, because the results vary only insignificantly whether the power supply operates on 50 or 60 Hz. AT&T proposes, however, that the test be conducted at 50 Hz rather than 60 Hz so that U.S. manufacturers would have test results in a format more readily acceptable in the Pub. 22 countries.

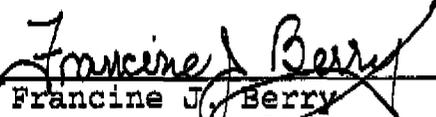
CONCLUSION

The Commission should adopt the proposal in the NPRM in accordance with the modifications discussed in AT&T's Comments and Reply Comments.

Respectfully submitted,

AMERICAN TELEPHONE AND TELEGRAPH COMPANY

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November 13, 1992

APPENDIX

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American Electronics Association - "AEA"
American Radio Relay League, Incorporated
Apple Computer Inc. - "Apple"
BT North America Inc. - "BT"
Capital Cities/ABC, Inc. - "Capital Cities"
Cardinal Technologies, Inc. - "Cardinal"
Computer and Business Equipment Manufacturers Association -
"CBEMA"
Cray Research, Inc. - "Cray"
EMACO, a TUV Product Service Company
Hewlett-Packard Company - "H-P"
International Business Machine Corporation - "IBM"
Silicon Graphics, Inc. - "Silicon Graphics"
Tandem Computers Incorporated - "Tandem"
Tandy Corporation - "Tandy"

CERTIFICATE OF SERVICE

I, Geraldine A. Gowers, do hereby certify, that on November 13, 1992, I mailed a true and correct copy of the foregoing "Reply Comments" first class, postage pre-paid to the following persons at the following addresses:

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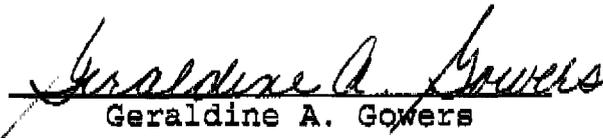
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