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HONG KONG GOVERNMENT INDUSTRY DEPARTMENT 工業署

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BY AIRMAIL

Ref. : IL 1712-7

Tel. : 2737 2566

9 February 1995

Dr. Michael Marcus, ✓
Assistant Chief,
Office of Engineering and Technology,
Federal Communications Commission,
1919 M Street, N.W.,
Washington, DC 20554,
U.S.A.

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

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Dear Dr. Marcus,

**FCC's Proposed Regulation on
Personal Computer Sub-assemblies/Components**

----- A personal computer manufacturer in Hong Kong, AST Research (Far East) Ltd., has written to comment on the captioned subject. A copy of the company's letter dated 27 January 1995 is enclosed for your consideration please.

Yours sincerely,

(C.C. Tse)
for Director-General of Industry

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Re your ref. : EC/Inf/13/94
January 27, 1995

Mr. C.D. Tam, Chairman
Electronics Committee
Industry & Technology Development Council
Industry Department
14/F, Ocean Centre
5 Canton Road, Kowloon
Fax No.: 2666 6015

Dear Sir,

Re: FCC's Proposed Regulation on Personal Computer Sub-assemblies/Components

We, being an oversea subsidiary of U.S. incorporated PC manufacturer, would like to express our serious concerns and strong disagreement on the newly proposed FCC regulation which calls for FCC "certification" requirement on individual sub-assemblies/components used in PC systems sold in US. We are hoping that ITDC Electronic Committee will channel our view on this matter to appropriate parties in FCC for consideration.

Some of our products currently shipped to our company various assembly plants in U.S. are Printed Circuit Board assemblies (PCBA) and other sub-assemblies for PC systems, these PCBAs and other sub-assemblies/components will be put into systems which are tested and certified to comply with existing FCC regulation.

Under the proposed FCC regulation, we may be forced to do FCC certification twice on single product, one in PCBA level, the other in assembled system level, which in no doubt will create significant burden in resources, and increase in product development cost. We hate to predict that end users will eventually suffer from paying for all these extra costs. The additional testing and certification process may also cause delay in our product launch schedule. We therefore believe that the proposed regulation is not practical and will have significant negative impact to our current operation.

From technical point of view, there is no guarantee that PC systems assembled from "certified" subassemblies/components under proposed FCC regulation can meet FCC regulation for complete system due to various factors such as different interaction/grounding effects on physical arrangement of subassemblies/components inside a system; possible change in operating speed of CPU in system board or change in configuration in system assembly; arrangement of cable connections inside a system and input/output connectors on the chassis. The most cost effective and appropriate way to ensure a system meeting FCC regulation for complete system is to test the assembled system itself.

Quite oppositely, the proposed FCC regulation may have adverse effect on increasing the risk of PC system having interference problems as assemblers may be allowed to ship systems assembled with "certified" subassemblies without going through proper testing on assembled system itself. People will be mislead to believe that system assembled from so called "low noise" sub-assemblies will be "low noise" (this may not necessary be true due to reasons stated above), there will be less assemblers willing to perform FCC testing on assembled systems to minimize interference problem. As the result, market will be filled with assembled systems with unpredictable level of radio emissions which in turn causes more interference problems.

In conclusion, we do not believe that the proposed FCC regulation will achieve the objective of minimizing interference problem it set for. We also believe that the proposed FCC will have significant and long lasting negative impact to PC manufacturers, both in U.S. and overseas alike. End user will not be benefit from this proposed FCC regulation.

Your sincerely,

Billie Lui, Vice President

cc: Mr. C.C. Tse, Secretary of Electronics Committee of Industry & Technology Development Council, Industry Department
ITDC Secretariat, Industry & Technology Development Council, Industry Department
Mr. Victor Lo, Chairman of IIC Electronics Industry Council of Federation of H.K. Industries (Fax #: 27213494)
Mr. Robert Cheung, Hong Kong Trade Development Council (Fax #: 8240266)
Mr. Colin Lau, Director of Engineering, AST Research (Far East) Ltd.

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