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**FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY**

EX PARTE OR LATE FILED

March 6, 1997

VIA COURIER

Mr. William F. Caton
Acting Secretary
Federal Communications Commission
Room 222
1919 M Street, NW
Washington, DC 20554

Re: Ex Parte Presentation
ET Docket No. 95-19

Dear Mr. Caton:

Representatives of the Intel Corporation ("Intel") met today with Commissioner Susan Ness and Mr. David Siddall, her Legal Advisor, on matters relating to Intel's pending petition for reconsideration in the above-captioned proceeding. Intel was represented by Patrick Gelsinger, Doug Probstfeld, and Paul Misener. The attached document formed the basis for discussions.

Pursuant to Section 1.1206 of the Commission's rules, an original and one copy of this notice is enclosed. Please address any questions on this matter to the undersigned.

Sincerely yours,

Paul E. Misener
Manager, Telecommunications and
Computer Technology Policy

Attachment

cc (US Mail, w/o Attachment)

Commissioner Susan Ness
Mr. David Siddall

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Reconsidering One Aspect of the New Part 15 Rules

Intel Corporation

March 1997

Overview

- Summary
- PC Assemblers
 - New FCC Part 15 Rules
- Problem with “Cover Off” Test
- Intel Petition for Reconsideration
 - Proposed Solution

Summary

- FCC's new PC emissions rules take effect in June.
- Generally, the new rules are good for American consumers and the U.S. PC industry.
- Unfortunately, one aspect of one test requirement is problematic and would thwart the FCC's goals.
- Intel petitioned for reconsideration (July '96) and is concerned that the testing problem remains.

PC Assemblers

- Several kinds of PC makers serve U.S. consumers.
- High- and medium-volume makers provide about 75% of the PCs sold in the United States.
- PC “assemblers” (or “integrators”) make the rest; they help provide high-tech PCs with lower prices and greater variety.
- Assemblers’ sales volumes are too low to shoulder test costs for every complete system configuration.
- They would like to use pre-authorized components as intended in the new FCC rules.

New FCC Part 15 Rules

- The existing rules are burdensome for assemblers.
- Last year, the FCC changed the rules in order to:
 - simplify PC emissions compliance,
 - stimulate competition in the PC industry,
 - save U.S. consumers and assemblers money, and
 - “provide the same level of protection against harmful interference.”

New Part 15 Rules (*cont.*)

- Two key aspects of the new rules: (1) a “Declaration of Conformity” process, and (2) authorization of “modular PCs.”
- Intel supports the Declaration of Conformity approach and generally supports the “modular PC” procedure under which system assemblers are allowed to certify PCs simply by using pre-authorized components.
- Under the new rules, CPU boards for use in modular systems must be tested in two configurations:
 - “cover on” and meet the FCC’s long-standing emission limits, *and*
 - “cover off” and not exceed 3 dB above the current limits.

Problem with “Cover Off” Test

- *Most CPU boards would fail the “cover off” test*, even though they would comply under the far more realistic “cover on” test procedure.
- CPU board redesign to meet the “cover off” test requirements would be very expensive and time consuming.

Problem with “Cover Off” Test (*cont.*)

- As a result, the new “cover off” test would not meet the FCC’s goals of simplifying PC emissions compliance, of stimulating competition, or of saving U.S. consumers and assemblers money.
- Ironically, “cover off” test results do not correlate well with the RF emissions performance of PCs in real world conditions.
- Further, the “cover off” test does not take into account the fact that RF emissions from other PC boards can exceed those from CPU boards.

Intel Petition for Reconsideration

- Accordingly, Intel petitioned for reconsideration in July, 1996.
- Because the new Part 15 rules take effect soon (on June 19) Intel is concerned that there has been no action on Intel's petition to replace the "cover off" testing requirement.

Proposed Solution

- Intel respectfully requests that the Commission:
 - Keep the Declaration of Conformity procedure: it reduces paperwork burdens and delay for everyone.
 - Keep the modular PC authorization process: it facilitates compliance by system assemblers.
 - Grant Intel's petition for reconsideration.
 - Replace the "cover off" test requirement with the same successful FCC testing program used for other PC boards: it considers the effect of cover shielding and realistically reflects a CPU board's real world RF emissions performance.
- Intel is prepared to assist the FCC in this effort by providing test data and other vital information.