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Before the
Federal Communications Commission
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554

In the Matter of)	
)	
Amendment of Parts 2, 15, 18 and)	ET Docket No. 97-94
Other Parts of the Commission's)	
Rules to Simplify and Streamline)	
the Equipment Authorization Process)	
for Radio Frequency Equipment)	

COMMENTS

The Telecommunications Industry Association ("TIA") Technical and Regulatory Reform Task Force ("TR²TF")¹ hereby submits these Comments in response to the FCC's Notice of Proposed Rulemaking ("NPRM") in the matter of Amendment of Parts 2, 15, 18 and Other Parts of the Commission's Rules to Simplify and Streamline the Equipment Authorization Process for Radio Frequency Equipment, released March 27, 1997, ET Docket No. 97-94.

¹ The Telecommunications Industry Association is a national trade association composed of product-oriented divisions, and various departments. Comments may be submitted by other departments or divisions representing the views of their respective members. The goals of the Technical and Regulatory Reform Task Force are to support the U.S. government in effecting the regulatory reform necessary to comply with the terms of mutual recognition agreements being negotiated; provide expert technical advice to the U.S. government; initiate regulatory and legislative reform when appropriate; and provide broad industry support through alliances with domestic and international associations.

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List A B C D E

Simplification of Existing Equipment Authorization Processes

TIA TR²TF strongly urges the Commission to retain Verification for the current category of products that are exempt from Type Acceptance, Certification, Notification, or Declaration of Conformity. Declaration of Conformity should be expanded to cover products other than Personal Computers ("PCs") and PC peripherals for which a good track record of compliance with the Commission rules can be shown. Because the Commission's issuance of an equipment authorization document is so important to gain entry to markets that accept the Commission's grant of authorization without the need for additional tests and equipment certification, TIA requests that the Commission devise an optional acknowledgment form for products eligible for Declaration of Conformity and Verification.

Cycle Time Reduction

Given the rapid advancement in telecommunications technology and the resulting short product life cycle, the Commission must expedite the equipment authorization process. TIA TR²TF believes that a ten-day cycle time for processing most applications is feasible and suggest ways to achieve this goal below.

Fee Payment

There are delays inherent in the fee payment process. TIA TR²TF suggests that the application for equipment authorization should be sent directly to the Commission and not to Mellon Bank with the fee payment. By processing the application in parallel with the fee payment process, at least one week on average could be saved.

TIA TR²TF agrees with the Commission's proposal of limiting the fees to two different amounts, \$895 for devices operating under Parts 15 and 18 of the rules and \$450 for everything else, and applying those charges for products that contain devices that require certification under either Part 15 or 18 and other rule parts, excluding telephone equipment registration under Part 68. The process of fee payment should be separate and independent from filing of the application. Options offered for fee payment should include credit card, deductions from an account on deposit with Mellon Bank, check, or special money order.

Electronic Filing

Electronic filing is supported as a means of significantly reducing time to market for products subject to Type Acceptance or Certification. Eliminating delays currently caused by sending applications to Mellon Bank along with administrative delays in handling paper filings should, in TIA TR²TF's estimation, be reduced by at least half the amount of time it takes to file and receive equipment authorization from the Commission.

An analysis of the filing process by the TIA TR²TF indicates that elimination and streamlining of the material required to be submitted in current applications must occur before electronic filing can be effectively implemented. The TR²TF found that a typical Type Acceptance filing for a cellular radio base station would involve transmitting so many graphic intensive pages (photographs and installation/user manual) that transmission time would be prohibitively long.

The amount of material submitted in applications has grown over time. Manufacturers tend to send more information than is absolutely required, and reviewers have, over the years, added to the material that they require. TIA TR²TF realizes that with advances in electronic document handling, the process may become simplified over time and better able to handle larger volumes of information. However, in order to realize the benefits of electronic filing to both manufacturers and the Commission using current technology, TIA TR²TF proposes that the Commission:

1. Establish a goal of applications processing within ten working days;
2. Define the absolute minimum required documents that must be filed in a Certification application; and
3. Eliminate the requirement to submit manuals and photographs with the application. In a process similar to Declaration of Conformity or Verification, manufacturers could be required to maintain copies of manuals and photographs of the product on file and furnish them to the Commission upon request by facsimile or post. A reasonable minimum time could be set by the Commission for a manufacturer to produce the needed documentation.

Two-Year Transition Period

TIA TR²TF believes that a two-year transition period for the changes needed to streamline the equipment authorization process is needed, not only to allow the Commission time to create and implant the regulatory and/or statutory changes necessary, but to afford the industry time for assimilation.

CONCLUSION

Decreasing the time to market benefits both industry and consumers alike by providing new technologies to end users more quickly at lower cost. TIA TR²TF supports the proposals offered by the Commission in the NPRM and applauds streamlining the equipment authorization process with a goal of eliminating delays in the time to market caused by lengthy or unnecessary testing and review.

Respectfully submitted,

Telecommunications Industry Association
Technical and Regulatory Reform Task Force

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